

In the Community to Serve®

2024-2025 Biennial Conservation Report

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Cascade Natural Gas Corporation Biennial Conservation Report Calendar Years 2024-2025

Background

Cascade Natural Gas Corporation's (CNGC, Cascade, or the Company) Energy Efficiency Department presents this Biennial Conservation Achievement Report of 2024-2025 Energy Efficiency Program accomplishments and activities, satisfying the commitment made by the Company in Docket UG-230937 Attachment A Biennial Conservation Plan (BCP) Conditions. This report contains the 2025 Annual Report and the Biennial report for years 2024-2025. Per the commitment made by CNGC, this report shall be submitted to the Washington Utilities and Transportation Commission (WUTC) by June 15 each year, with advance copies provided to the Company's Conservation Advisory Group (CAG) 30 days prior to Commission filing. The report contains the following:

- Planned and claimed gas savings from conservation, including a description of the key sources of variance between the planned and actual savings
- Budgeted and actual expenditures made to acquire conservation through the conservation cost recovery adjustment described in Condition 12
- The portfolio- and program-level cost effectiveness of the actual gas savings from conservation
- The biennial conservation target
- A discussion of the steps taken to adaptively manage conservation programs throughout the preceding year
- All program evaluations completed in the preceding year
- Program outreach in 2024-2025

Cost-Effective Inputs

Avoided Costs for calculating annual achievements coincide with the tariffs in effect at the time of Program participation. For 2024-2025, the Residential and Commercial/Industrial (C/I) cost effectiveness is calculated based on the Avoided Costs in the 2023 Integrated Resource Plan (IRP). As required by Revised Code of Washington (RCW) 80.28.380, this set of Avoided Costs includes the Social Cost of Carbon (SCC).¹

Demand Side Management (DSM) inputs include a 5.06% long-term discount rate and an inflation rate of 2.0% for the Avoided Costs from the 2023 IRP; these inputs are applicable

¹ RCW 80.28.280 Gas Companies-Conservation Targets | [RCW 80.28.380 \(wa.gov\)](https://leg.wa.gov/RCW/default.aspx?cite=80.28.380)

to the Residential, C/I, and Low-Income Weatherization Programs. Please note that these rates were used to develop the 2023 Conservation Potential Assessment (CPA), as well as the 2024-2025 BCP, and do not reflect updates or alternative scenarios which may have been analyzed since this time.

Many inputs affect the costs and value of conservation in cost-effectiveness calculations. Discrete Non-Energy Impacts (NEI) are calculated per measure for the Residential and C/I Programs. These NEI traditionally have the greatest influence on the Total Resource Cost (TRC) test, which is included in this report. However, for the purposes of Program evaluation, Cascade applies the modified Utility Cost Test (UCT), as required by the BCP conditions document under UG-230937.²

Goal Setting

The Company's Energy Efficiency (EE) portfolios are periodically reevaluated and updated to balance cost effectiveness (using current Avoided Costs), participation outcomes, new legislation, and updated building codes on a two-year cycle. The Company confers with its CAG on a quarterly basis throughout the cycle, as well as on an ad-hoc basis, as adaptive management decisions dictate.

² Docket UG-230937 Attachment A.pdf January 17, 2024 | [UTC \(wa.gov\)](https://www.wa.gov)

Table 1: Conservation Advisory Group Meeting Topics

	2024	2025
Q1	- Equity Advisory Group - ERA Software Migration - C/I Program RFP	- Residential Envelope EM&V update - 2025 CPA update - Home Energy Report update - ERA Software Migration update
Q2	- EM&V Update from ADM - Point of Sale Program Update - ERA Software Migration Update - 2025 CPA - NEEA Cycle 7 Funding - 2022-2023 Biennial Report Update	- Residential Envelope EM&V update - 2025 CPA update - CNGC Avoided Costs - Home Energy Report update
Q3	- EM&V Ppdate from ADM - 2025 CPA update - NEEA Cycle 7 Funding - 2022-2023 Biennial Report Update	- Home Energy Report Round 1 Recap - Home Energy Report Round 2 Proposal - Regulatory Timeline update
Q4	- Home Energy Report Pilot - 2025 CPA update - Outreach Strategy update - ERA Software Migration update	- CCA Revenue Discussion - Regulatory Timeline update

*All meetings contained Portfolio/Program Updates

**Meeting content is hosted here: [Cascade Natural Gas Conservation Advisory Group Meetings](#)

The Company has used the LoadMAP forecasting tool as the end-use planning software for the DSM section of the IRP and Program planning since Q2 2018. One of the primary benefits of this forecasting tool is alignment with regional standard practices, per the Northwest Power and Conservation Council, and its ability to run forecasts based on a methodology consistent with the National Action Plan for Energy Efficiency *Guide for Conducting Energy Efficiency Potential Studies*.³ In alignment with the Environmental Protection Agency guide, “Three types of potential were developed as part of this effort: technical potential, achievable technical potential, and achievable economic potential”.⁴

It should be noted the 2023 CPA set aspirational targets for the Program with inputs being set to maximize potential therm savings for the Program. As goal setting is only an estimate, the achievable economic level of potential savings identified by a model is

³ [Guide for Conducting Energy Efficiency Potential Studies | Climate and Energy Resources for State, Local, and Tribal Governments | US EPA](#)

⁴ “2020 Cascade Natural Gas Conservation Potential Assessment” pg. 15 AEG, Applied Energy Group, June 16, 2021.

unable to fully account for industry changes after the CPA is completed. This can have a significant impact on Program performance, such as the implementation of the 2021 Washington State Energy Code (WSEC) or changing market and administrative conditions that affect supply chains or consumer willingness to invest in energy efficient upgrades. For more information on how the Company adapts to challenges, please refer to the Adaptive Management Strategies section of this report.

Summary of 2024-2025 Program Achievements

2024-2025 required the Company's Energy Efficiency Incentive Programs (EEIP) to fully embrace adaptive management practices to maintain Program momentum and customer support. Throughout this biennium, Cascade focused on increasing participation levels in the face of high inflation and a drastic decrease in New Home Program rebates as a result of code changes (e.g., RCW 19.27A.160, RCW 19.27A.020(2)(a)), hesitancy in capital investment for natural gas projects, and the overall economic climate. These factors are most pronounced in the Commercial and Industrial sectors, where large capital investment is often required. Uncertainty in future conditions leads to anticipated cost-effective, available conservation projects falling through or being delayed.

Despite these factors, Cascade's EEIP experienced record years in 2024 and 2025. Cascade's EEIP performed phenomenally, leading to the largest surplus in therm savings compared to goal in a decade. Additional details regarding this robust performance in the face of adversity can be found in the Adaptive Management section.

The Residential Program achieved a record number of therm savings, largely because of increased resource investment, outreach, and efficiencies gained in the Point-of-Sale (PoS) Program. This adaptive management strategy increased partnership between the Company and its Trade Ally (TA) contractors through the intensified promotion of the PoS offering, which provided thousands of up-front Energy Efficiency incentives to homeowners. The increase in Trade Ally participants in the Program helped posit higher-efficiency options to customers, which was a key driver in measures like attic insulation exceeding their planned volume (e.g., attic insulation exceeded projections by 552,743 therms with a majority of projects submitted through the PoS program). This offering is a prime example of Cascade transforming a pilot project from prior years into a mainstay for cost-effective energy savings while supporting dozens of community businesses and improving thousands of customers' homes in the process. At the time of this report's submission, the Program's performance continues to exceed expectations. CNGC will continue monitoring and working with the Conservation Advisory Group to sustain the high level of performance demonstrated by the Residential Program.

The C/I Program did not meet the 2024-2025 biennial therm savings goal despite displaying an unwavering investment in business relationships. The Program remained resilient, with a focus on continual communication and education with rate-paying customers to seek energy-efficient equipment and envelope measures, as well as implementing enhanced business processes wherever possible. The 2024-2025 biennium has experienced a myriad of building and energy code changes, changes to these changes, and an unknown outlook for natural gas impacting future business operations. Cascade's EEIP has made a commitment to C/I customers to remain a source of information and opportunity for businesses to enjoy the benefits of making energy-efficient investments. Additionally, increased unpredictability in federal funding caused several large-scale projects to be cancelled or put on hold.

Since 2008, the Company has proudly offered its Schedule 301, Low-Income Weatherization Incentive Program (WIP), providing essential rebates for weatherization measures to income-eligible customers through qualified Agencies. This Program significantly reduces energy burdens, enhances indoor air quality, and increases building durability. Despite challenges, the Company remains dedicated to maximizing the reach of weatherization services to low-income natural gas customers through efforts, including increased resource investment and pilot projects. The 2024-2025 Biennium saw impressive therm savings of 14,297 therms and 16,294 therms, respectively. Incentive spending for 2024 was \$1,315,583, representing 95% of the budget, while 2025 saw incentive spending of \$1,426,858, which was 92% of the budget. In 2025, the Company was able to serve 89 homes, which is a substantial increase over the 61 homes served in 2024, despite CNGC Agencies continuing to experience ongoing staffing shortages and funding insecurity. Although the number of homes served was lower than estimated due to continued Agency staffing shortages, funding insecurity, and other complications with serving vulnerable communities, the Company continues to adapt and innovate, ensuring that weatherization services remain accessible and impactful for the communities it serves. One such innovation is the WIP pilot program, described in further detail in its dedication section, enabling third-party weatherization contractors to assist in handling the influx of program participants. Cascade has also developed a language access plan, showing the Company's continued dedication to making content more easily accessible to non-English speakers.

Table 2: Program Achievements

2024 Program Achievements

	Residential	Commercial	Low-Income	Total
Therm Estimates	426,621	368,700	19,522	814,843
Therms Achieved	670,757	377,038	14,297	1,062,092
NEEA Savings*	56,672	10,162	N/A	66,834
Measures Installed	8,562	78	248	8,888
Carbon Offset**	3,562	2,002	76	5,640

2025 Program Achievements

	Residential	Commercial	Low-Income	Total
Therm Estimates	502,044	443,760	21,565	967,369
Therms Achieved	1,111,733	181,789	16,294	1,309,816
NEEA Savings*	14,766	8,398	N/A	23,164
Measures Installed	11,782	134	318	12,234
Carbon Offset**	5,903	965	87	6,955

*Savings reported by NEEA not included in portfolio

**Tons of Carbon Dioxide Equivalent (CO₂e) avoided, based on carbon offset of 0.00531 metric tons of CO₂e per therm from IRP, which includes end use & upstream emissions

In 2024-2025, the Company achieved deemed Residential therm savings of 1,782,490. This represents 192% of the 2024-2025 Residential therm savings goal. In 2024-2025, the Company achieved deemed C/I therm savings of 558,827. This represents 69% of the C/I Program's 2024-2025 therm savings goal. The Residential Program's performance was bolstered by multiple measures outperforming their expected growth detailed in the BCP. One such example is Attic Insulation which single-handedly accounted for 542,743 therms above plan. Conversely, the C/I Program had numerous measures that were below their planned volume. Most notably, Demand Control Ventilation measures were 196,227 therms below the forecasted amount. Similarly, Attic Insulation and Radiant Heating were 76,596 and 19,591 therms below what was predicted in the Top 10 Measures section of the 2023 CPA, respectively. Additional details regarding measure-by-measure performance can be found in the work papers submitted with this report.

At a portfolio level, the savings for Residential, C/I Programs, and Low-Income equated to 2,371,908 therms, achieving 133% of the 2024-2025 goal.

Program cost effectiveness for 2024-2025 is shown in Table 3: Program Cost Effectiveness. The UCT Ratio goals forecasted in the 2024-2025 BCP for the Residential and C/I Programs were 3.98 and 4.91, respectively, and 4.45 combined.⁵ Ideally, each Program operates above a 1.0 cost-effectiveness ratio, and both the C/I and Residential programs significantly exceeded the 1.0 threshold. The C/I Program was 29% more cost effective and the Residential Program was 15% more cost effective than the BCP forecast. The measure composition for the Residential Program followed the 2024-2025 BCP forecast closely with weatherization measures, prescriptive air sealing, furnaces, and tankless water heaters totaling the majority of annual therm savings. The measure composition for the Commercial Program also followed the forecast closely, primarily being comprised of insulation and boiler projects, although Demand Control Ventilation projects were much less available than anticipated.

Table 3: Program Cost Effectiveness

2024 Program Achievements			2025 Program Achievements			Biennium Program Achievements		
Cost Effectiveness*	UCT	TRC	Cost Effectiveness*	UCT	TRC	Cost Effectiveness*	UCT	TRC
Residential	4.18	5.28	Residential	4.68	3.47	Residential	4.57	3.99
Commercial	5.65	3.9	Commercial	4.64	4.56	Commercial	5.05	4.01
Portfolio	4.41	4.79	Portfolio	4.56	3.47	Portfolio	4.49	3.87

*Cost effectiveness excludes Northwest Energy Efficiency Alliance and Regional Technical Forum membership

Programmatic Spending

Table 4: Programmatic Expenses & Paid Rebates represents the Program's biennial expenditures for incentives, Programmatic delivery, and administrative costs associated with implementation of the Company's Washington EE Programs compared to estimated budgets. At a portfolio level, 2024 paid incentives were \$3,634,137 more than the budget. The 2024 incentive spend was a result of increased rebates, particularly for ceiling/attic insulation, where the Trade Ally Point of Sale program increased expected participation in the Residential Program. 2025 saw similar overage in Residential incentive spending, driven by ceiling/attic insulation participation continuing to greatly exceed forecasts due to CNGC's adaptive management strategies and increased investments in program offerings. The Low-Income Program's actual incentives exceeded their estimate

⁵ Docket UG-210838-CNGC-2022-2023-BCP-Plan-11-01-21.pdf | [UTC \(wa.gov\)](https://www.utc.wa.gov)

in 2025. This was primarily due to the cost of completing measures exceeding their estimated cost. Programmatic administrative costs were \$1,416,347 less than the estimated administrative budget in 2024-2025.

Table 4: Programmatic Expenses & Paid Rebates

2024 Programmatic Expenses and Paid Rebates					
	Incentive Budget Estimates	Actual Incentives Paid	Administrative Budget Estimates	Actual Administrative Expenditures	Actual Totals
Residential	\$4,965,868	\$9,334,819	\$1,708,246	\$1,157,207	\$10,492,026
Commercial	\$1,758,699	\$1,085,876	\$1,351,913	\$1,247,031	\$2,332,907
Low-Income	\$1,377,574	\$1,315,583	\$459,191	\$312,000	\$1,627,583
Program Totals	\$8,102,141	\$11,736,278	\$3,519,350	\$2,716,238	\$14,452,516
	Direct Benefit to Customers (DBtC)*		Program Delivery		Total Program Costs
Expenses	\$12,005,577		\$3,091,972		\$15,097,549
Ratio	80%		20%		
NEEA Gas Market Transformation & Regional Technical Forum					\$381,908

2025 Programmatic Expenses and Paid Rebates					
	Incentive Estimates	Incentives Actuals	Admin Estimates	Admin Actuals	Actual Totals
Residential	\$5,843,792	\$16,242,013	\$1,742,411	\$1,678,741	\$17,920,754
Commercial	\$2,116,735	\$952,113	\$1,453,405	\$1,044,231	\$1,996,344
Low-Income	\$1,552,173	\$1,999,001	\$517,391	\$377,000	\$2,376,001
Program Totals	\$9,512,700	\$19,193,127	\$3,713,207	\$3,099,972	\$22,293,099
	Direct Benefit to Customers (DBtC)*		Program Delivery		Total Program Costs
Expenses	\$19,193,527		\$3,703,960		\$22,897,487
Ratio	84%		16%		
NEEA Gas Market Transformation & Regional Technical Forum					\$604,388

*DBtC includes all rebates paid through the Residential, Commercial / Industrial, and Low-Income Programs, in addition to some expenses recorded under the “Programmatic Expenditures” category, like Quality Control Inspections, and partnership with community organizations collaborating directly with customers to assist with rebate eligibility and installation

Costs associated with the Northwest Energy Efficiency Alliance (NEEA) Gas Market Transformation efforts and Regional Technical Forum (RTF) participation are separated from general Programmatic expenditures for the purpose of assessing Program cost-effectiveness. Market transformation investments in these groups create conditions for future energy savings. NEEA estimates cost-effectiveness on a longer time horizon for its initiatives, in lieu of annualized cost-effectiveness calculations. A second set of UCT and TRC benefit cost ratios are available in *230937-CNGC-2024-2025-Biennium-Conservation-Arpt-WP-1-06-11-2026.xlsx* to assess cost-effectiveness of the Program portfolio including the NEEA and Regional Technical Forum expenses. 2024 marked the 10th year of Cascade’s participation with NEEA.

2024 marked the third year NEEA is reporting therm savings estimates for Cascade’s service territory. As seen in Table 2: Program Achievements, NEEA estimated that 56,672 and 10,162 therms were saved for the Residential and Commercial Programs in 2024,

respectively. All 2024 Residential Program savings, and 6,294 therms from the Commercial Program, are a result of updated codes and standards. These savings are a fraction of the total amount NEEA believes will be saved through their code-update efforts and are proportional to the funding provided by the Company to NEEA in support of code updates and market transformation efforts. These savings are represented outside other Program accomplishments; see *230937-CNGC-2024-NEEA-Arpt-for-CNGC-WP-5-06-12-2025.pdf* for details on NEEA's efforts in 2024.

In 2025, NEEA estimates therms savings of 14,766 for the Residential Program and 8,398 for the Commercial Program, which are above the NEEA baseline. The majority of the Residential savings are attributed to Extended Motor Products-Pumps, relating to water heating. The majority of the Commercial savings are attributed to Product Standards and New Construction. For additional information regarding 2025 and updated figures for 2024, please see *230937-CNGC-2025-NEEA-Arpt-for-CNGC-WP-5-06-11-2026.pdf*.

The Company includes a Direct Benefit to Customer (DBtC) ratio, per Docket UG-161253, with a target to exceed 60% of expenses attributed to direct customer benefit. The portfolio of Programs in 2024 and 2025 exceeded the target, achieving a DBtC of 80% and 84%, respectively. The increase in DBtC is attributable to lower administrative expenses and higher incentive payouts due to the success of adaptive management within the Program and resulting record quantity of therms saved.

Progress to Biennial Goals

2022 signified the first year for the Company's EEIP under the new Biennial planning horizon. Pursuant to RCW 80.28.380 the "Company must establish an acquisition target every two years and must demonstrate that the target will result in the acquisition of all resources identified as available and cost-effective".⁶ Cascade filed its second BCP in the fall of 2023 for Program Years 2024 and 2025; the 2024 and 2025 actuals are shown in Table 5: Biennial Estimates for Spending & Savings.

⁶ RCW 80.28.380 Gas Companies-Conservation Targets | [RCW 80.28.380 \(wa.gov\)](https://leg.wa.gov/RCW/default.aspx?cite=80.28.380)

Table 5: Biennial Estimates for Spending & Savings

	Calendar Year 2024			2024 Total	Calendar Year 2025			2025 Total	Biennium Total
	Residential	C / I	Low-Income		Residential	C / I	Low-Income		
Incentive Estimate	\$4,965,868	\$1,758,699	\$1,377,574	\$8,102,141	\$5,843,792	\$2,116,735	\$1,552,173	\$9,512,700	\$17,614,841
Incentive Actual	\$9,334,819	\$1,085,876	\$1,315,583	\$11,736,278	\$16,242,013	\$952,113	\$1,999,001	\$19,193,127	\$30,929,405
Admin Estimate*	\$1,708,246	\$1,351,913	\$459,191	\$3,519,350	\$1,742,411	\$1,453,405	\$517,391	\$3,713,207	\$7,232,557
Admin Actual	\$1,157,207	\$1,247,031	\$312,000	\$2,716,238	\$1,678,741	\$1,044,231	\$377,000	\$3,099,972	\$5,816,210
Therm Estimate	426,621	368,700	19,522	814,843	502,044	443,760	21,565	967,369	1,782,212
Therms Actual	670,757	377,038	14,297	1,062,092	1,111,733	181,789	16,291	1,309,813	2,371,905
NEEA Natural Gas Market Transformation				\$348,908				\$562,988	\$911,896
Regional Technical Forum				\$33,000				\$41,400	\$74,400

*Includes Cascade staff salary, outreach costs associated with Weatherization Program delivery separate from payments to agencies, 15% project coordination and 10% indirect rate paid as part of a total rebate for a qualified project | The updated 20% project coordination fee was not in place at the time of this BCP filing

In 2024-2025, Cascade saved a total of 2,371,905 therms, exceeding the biennial savings goal of 1,782,212 resulting in 589,696 therms of excess conservation savings for the biennium. Spending was higher than per-therm expectations, with \$36,745,615 invested in incentives and admin, or 148% of the allotted biennial budget. Actual Incentives paid for 2024-2025 exceeded budget due to significantly exceeding the annual therm goal. In 2024-2025, the Program achieved 133% of the overall biennial therm target, spending 176% of the biennial incentive budget. The 2024-2025 paid administrative costs were 80% of the budgeted administrative expenses due to operating efficiencies, open positions, and general costs being lower than forecast. These factors contributed to a higher than forecasted portfolio UCT ratio.

Program Highlights

Residential

Although the Existing Home Program achieved record therm savings, the New Home Program had extremely low participation compared to prior years. This anticipated downturn was a result of the adoption of the 2018 and 2021 WSEC. Many builders, especially large builders, are turning to electric appliances in new homes to meet the updated Energy Efficiency Credit requirement from section R406 of the WSEC. As builders install fewer gas appliances, the savings available in the New Home market are trending sharply downwards for natural gas Energy Efficiency Programs. CNGC anticipates New Homes will comprise little of the Program therm savings going forward, which will be reflected in future Conservation Potential Assessments and outreach strategies.

The top weatherization measure, ceiling/attic insulation, accounts for 64% of all therm savings, while 83% of all therms achieved come from weatherization measures. Updates to the ceiling insulation measures in 2022 removed the lower R-value offering of insulation at R-38+, encouraging customers to pursue R-49+ or R-60+ ceiling insulation through 2024 and 2025. With a continued focus from Trade Ally Point-of-Sale contractors, ceiling/attic insulation installs continue to be the top measure for the Residential Program for the 2024-2025 biennium. As seen in Table 3: Program Cost Effectiveness, the Residential Program saw an increase in its UCT from 3.50 to 4.68. This can be mostly attributed to an 80% increase in ceiling/attic insulation measures year over year, which is the Program's most efficient measure. Prescriptive air sealing, a measure first offered in 2022, accounted for 9% of therm savings in 2024-2025. While this measure does not save as much energy as whole house air sealing on a per home basis, it's a more accessible offering which requires air sealing of the attic and crawl space thermal and pressure boundaries in accordance with Bonneville Power Administration weatherization manual standards. Additionally, this measure is only available when installed concurrently with ceiling, wall, or floor insulation and was completed with a majority of POS projects.

Equipment measures accounted for 17% of the 2024-2025 biennial therm savings. 70% of therm savings from equipment upgrades come from Natural Gas Furnace upgrades, which remain consistent with the past biennium. Cascade understands that there were several primary drivers behind the shift from Equipment measures to Weatherization projects. First, there has been a continued decrease in New Home rebate applications which traditionally included equipment measures. Additionally, rebates for equipment measures may only incentivize a small portion of installation costs, compared to envelope measures which can often be incentivized to lower the cost for the customer. Lastly, insulation measures often result in significantly more therm savings, with a greater measure life on a per-home basis than an equipment measure. This shift in programmatic uptake was expected and is a direct result of adaptive management in the prior biennium leading to the fruition of a programmatic shift first outlined in the 2024-2025 BCP.

Table 6: Residential Program Highlights

New and Existing Residential Equipment & Weatherization Measures						
Existing Home Weatherization		Measures		Therms		
Insulation (sq. ft.)		2024	2025	2024	2025	% Biennial Therm Savings
Ceiling or Attic Insulation	8,932,950	2,168	3,883	362,582	774,503	63.79%
Floor Insulation	1,745,315	565	812	24,041	33,118	3.21%
Wall Insulation	293,477	151	185	7,708	12,667	1.14%
Duct Insulation*	98,233	316	445	6,704	10,199	0.95%
Windows	39,627	146	142	5,219	5,021	0.57%
Other Weatherization		Measures		Therms		
Duct Sealing		332	649	24,182	46,464	3.96%
Whole Home Air Sealing		20	89	1,190	4,702	0.33%
Prescriptive Air Sealing		1,860	2,792	75,431	80,480	8.75%
Weatherization Bundle A**		406	579	N/A	N/A	N/A
Weatherization Bundle B**		18	50	N/A	N/A	N/A
<i>Subtotals</i>		5,982	9,626	507,056	967,154	82.71%
New & Existing Equipment Measures		Measures		Therms		
ENERGY STAR® Clothes Washer		76	75	455	400	0.05%
HE Tankless Water Heater		228	283	14,655	18,180	1.84%
HE Combination Domestic Hot Water & Hydronic Space Heating		23	14	3,465	2,067	0.31%
HE Boiler		14	29	1,688	4,019	0.32%
HE Exterior Door		16	19	163	143	0.02%
HE Natural Gas Furnace		1,303	1,180	115,454	100,491	12.11%
HE Natural Gas Hearth		64	20	2,751	559	0.19%
ENERGY STAR® Smart Thermostat		482	436	15,544	14,156	1.67%
Programmable Thermostat		368	166	9,526	4,564	0.79%
<i>Subtotals</i>		2,574	2,222	163,702	144,579	17.29%
Residential Totals		8,556	11,848	670,757	1,111,733	100%

*Duct Insulation reported in linear feet

**Weatherization Bundle measures are non-energy saving measures; these bundles encourage multi-measure weatherization projects

Commercial/Industrial

The CNGC C/I Program finished 2024-2025 saving customers 558,827 therms, 69% of the overall goal for the biennium. Weatherization yielded 45% of therm savings for C/I prescriptive measures, with roof insulation accounting for 47% of therm savings attributed to weatherization and 21% of the total prescriptive therms savings. Boilers generated 145,876 therm savings for the Program, or 43% of the total therm savings goal, and 79% of the savings for equipment upgrades. Other popular measures include attic insulation, warm-air furnaces, and tankless water heaters.

The Program saw significant drop-offs in several measures in the 2022-23 biennium due to changing market conditions and supply chain challenges delaying project delivery. Although some of these constraints eased in 2024-2025, these headwinds continued to affect both prescriptive and custom projects throughout the year due to the multi-year cycle some C/I projects take to go from a planning phase to execution. Inflation and increased interest rates made financing large projects anecdotally more difficult.

Custom projects achieved 220,104 therms in 2024-2025. In comparison, custom projects achieved 47,666 therms in 2023 and 98,789 therms in 2022. Cascade is used to seeing the cyclical nature of custom C/I therm savings, as large one-off projects have historically allowed the C/I Program to exceed goal intermittently greatly. This can be seen in Figure 1: C/I Portfolio Therm Savings 2022-2025 which shows the total portfolio breakdown between prescriptive and custom measures. The development of these projects often spans multiple years, and it is difficult to predict the timing at which they will be completed. CNGC is planning to heighten focus in the future on smaller, more consistent C/I custom projects, inspired by the opening of WUTC Staff on Docket UG-210838. While these custom projects are more unpredictable and less numerous than prescriptive measures, they were not the driver of the below plan performance. As previously noted, several prescriptive measures were below planned participation levels, with cumulative prescriptive measure therms reaching 53% of biennial expectation. Custom measures achieved 403% of expectation of planning.

Figure 1: C/I Portfolio Therm Savings 2022-2025

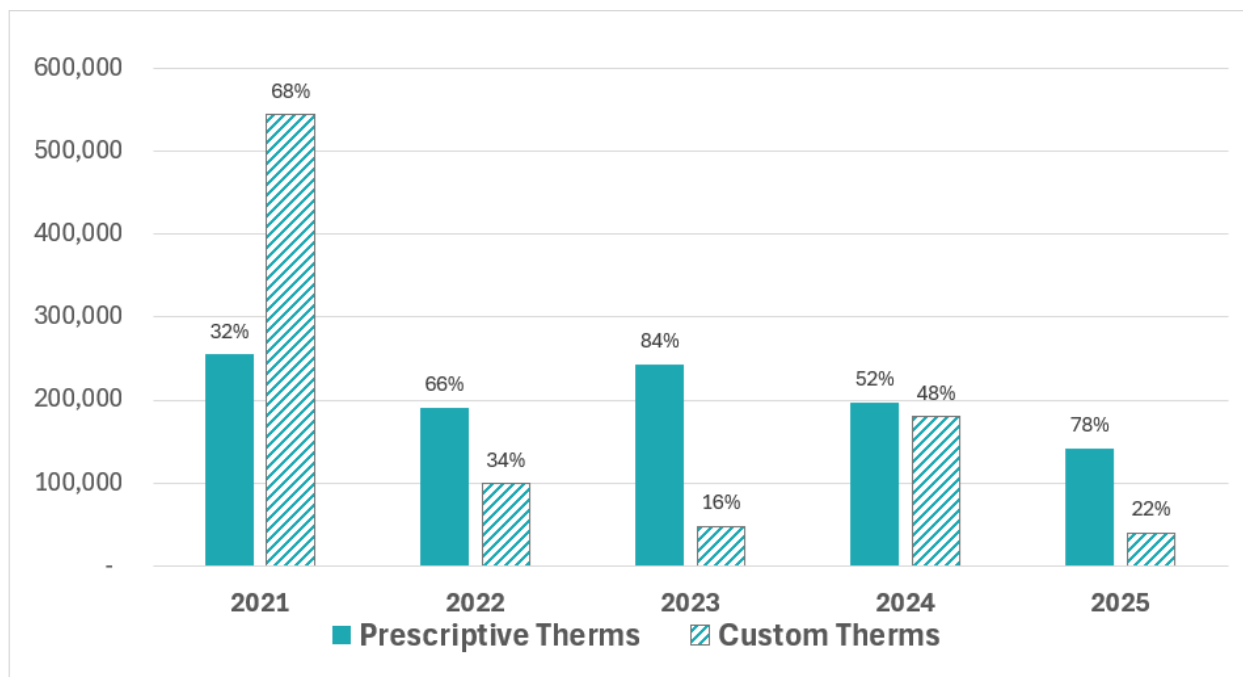


Table 7: C/I Program Custom Highlights

Commercial Equipment & Weatherization Custom Measure					
Weatherization	Projects		Therms		Savings
Custom Project Measures	2024	2025	2024	2025	% of Custom Therm Savings
Custom DDC Controls	2	1	27,430	14,435	19.02%
Custom HVAC	-	1	-	625	0.28%
Custom Heat Recovery	10	1	114,164	22,848	62.25%
Custom Insulation	-	3	-	1,694	0.77%
Custom Other	3	-	29,241	-	13.29%
DDC HVAC Control upgrades	2	-	9,667	-	4.39%
Custom Program Totals	17	6	180,502	39,602	100%

Table 8: C/I Program Prescriptive Highlights

Commercial Equipment & Weatherization Prescriptive Measure								
Weatherization	Projects		Measures			Therms		
Insulation Measures	2024	2025	2024	2025	Unit	2024	2025	% of Prescriptive Therm Savings
Insulation - Attic - Tier 1	9	5	33,805	108,166	/sq.ft.	10,480	33,531	12.99%
Insulation - Attic - Tier 2	5	11	15,177	44,070	/sq.ft.	4,857	14,102	5.60%
Insulation - Floor	2	6	5,424	23,607	/sq.ft.	304	1,322	0.48%
Insulation - Pipe - 1.5"	1	-	1,182	-	/LF	7,092	-	2.09%
Insulation - Roof - Tier 2	1	1	195,060	2,400	/sq.ft.	70,185	864	20.98%
Insulation - Wall - Tier 2 - Min R-19	5	10	20,820	8,354	/sq.ft.	3,956	1,587	1.64%
Windows - Tier 1	8	4	3,851	1,602	/sq.ft.	1,916	578	0.74%
Windows - Tier 2	-	1	-	115	/sq.ft.	-	42	0.01%
Subtotals	31	38	275,319	188,314		98,790	52,027	44.53%
Foodservice	Projects		Measures			Therms		
Convection Oven (Restaurant)	1	1	2	1	/oven	1,298	649	0.57%
Convection Oven (School)	1	-	2	-	/oven	282	-	0.08%
Subtotals	2	1	4	1		1,580	649	0.66%
Space & Water Heating Measures	Projects		Measures			Therms		
Boiler	15	22	36,340	42,745	/kBtu/hr in	74,064	71,812	43.07%
Demand Control Ventilation (DCV)	-	2	-	416	/ton	-	4,697	1.39%
Domestic Hot Water Tanks - Condensing	2	10	1,397	2,738	/kBtu/hr in	5,306	10,402	4.64%
Radiant Heating	1	-	400	-	/kBtu/hr in	1,732	-	0.51%
Tankless Water Heater - Tier 2	6	4	192	24	/gpm	7,296	903	2.42%
Warm-Air Furnace	22	11	7,003	954	/kBtu/hr in	7,769	1,698	2.79%
Subtotals	46	49	45,331	46,877		96,167	89,511	54.82%
Prescriptive Program Totals	79	88	320,654	235,192		196,537	142,187	100%

Two major factors impacted 2025. Firstly, there were increased barriers for project funding, including cancellation of funds from federal sources. This led to at least ten known projects being delayed or cancelled, despite Cascade and its commercial partner, TRC Industries Inc., investing significant resources in these projects. The largest such project was a custom heating plant decentralization project at the Naval Air Station at Whidbey Island. This project alone was projected to save 700,000 therms and its

completion would have resulted in the C/I Program significantly exceeding its therm savings goal. Other examples include multiple greenhouse heat curtain projects and custom projects across the territory. Potential savings for all Industrial customers, including those of large scale, are factored into CNGC's modeling, so these potential savings were accounted for in the 2023 CPA. Secondly, a minor processing delay between when TRC Industries Inc. submitted the completion of projects in December 2025 and when Cascade issued the rebates for those projects in early January 2026 resulted in 10 projects being shifted into 2026 achievements. These 10 projects accounted for approximately 142,638 therm savings. If these therms had been accounted for in 2025's therm savings, the C/I Program's annual percentage-to-goal would have increased to 86%. This minor timing delay resulted in no real-world impact to cost-effective therm savings for completion of these projects and will simply be reflected in higher therm saving achievement in the following biennium rather than the current biennium.

Low-Income Weatherization Incentive Program

The Company has offered its Schedule 301, Low-Income Weatherization Incentive Program (WIP), since 2008. The WIP offers rebates for weatherization measures to qualified Agencies delivering whole-home energy improvements through the Weatherization Assistance Program (WAP) to income-eligible customers in the CNGC service territory. The Company supports Low-Income Weatherization: it reduces customer energy burden, improves indoor air quality, and increases building durability. CNGC is committed to ensuring low-income natural gas customers receive as many weatherization services as possible and believes it can achieve this through the WIP.

As seen in Table 9: Community Action Agencies, CNGC had ten Agencies actively participate in the Program in 2024, with the Housing Authority of Skagit County accounting for 34% and the Opportunity Council accounting for 21% of total participation. In 2025, seven Agencies actively participated in the Program, with Coastal Community Action Program accounting for 39% of participation and the Opportunity Council accounting for 22%.

Table 9: Community Action Agencies

2024 Community Action Agency

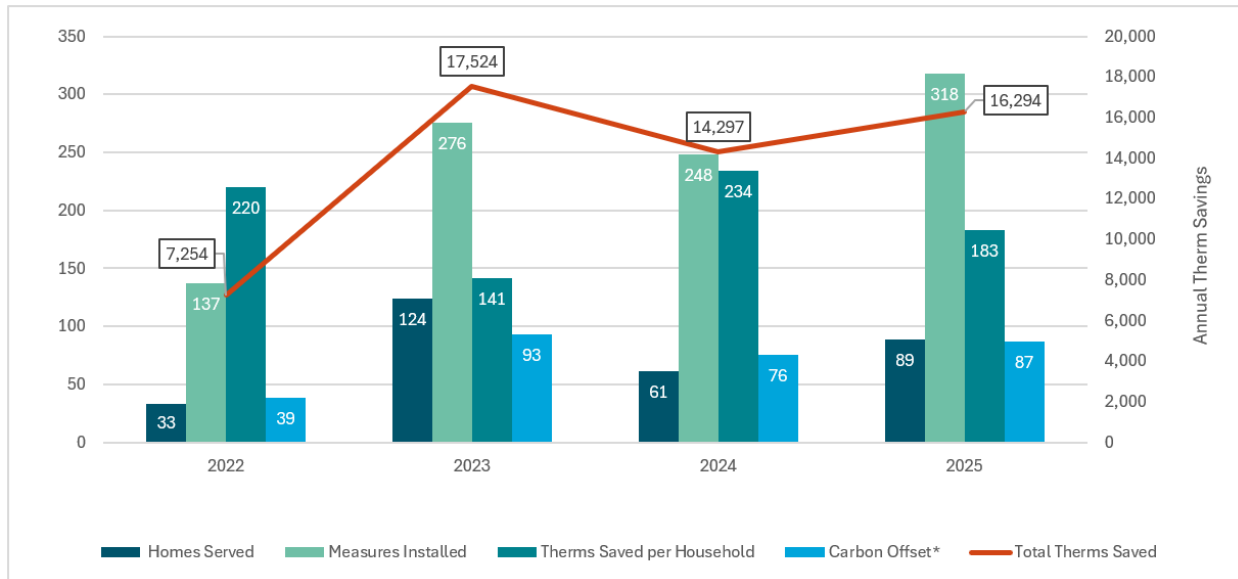
Community Action Agency	County Served with CNGC Customers	Estimated Participation
Blue Mountain Action Council	Walla Walla	3
Community Action Committee	Kennewick, Pasco	4
Community Action Council of Lewis, Mason, Thurston	Lewis, Mason, Thurston	1
Coastal Community Action Program	Grays Harbor, and Pacific	6
Housing Authority of Skagit County	Skagit	21
Kitsap Community Resources	Kitsap	4
Lower Columbia Community Action Council	Cowlitz	1
Northwest Community Action Center	Toppenish	3
Opportunities Industrialization Center of Washington	Adams, Grant, Yakima N of Union Gap	5
Opportunity Council	Island, Whatcom	13

2025 Community Action Agency

Community Action Agency	County Served with CNGC Customers	Estimated Participation
Blue Mountain Action Council	Walla Walla	2
Community Action Committee	Kennewick, Pasco	2
Coastal Community Action Program	Grays Harbor, and Pacific	35
Housing Authority of Skagit County	Skagit	8
Northwest Community Action Center	Toppenish	10
Opportunities Industrialization Center of Washington	Adams, Grant, Yakima N of Union Gap	13
Opportunity Council	Island, Whatcom	20

On an annual basis, an Administrative Agreement is required for each Agency participating in the WIP. Each Agency provides an estimate of projects to complete for the current year. In the agreement with the Company, the Agencies committed to serving 105 homes through the WIP in 2024 and 88 homes in 2025. This agreement count is an estimate of projects each Agency believes they may be able to complete based on Agency resources and bandwidth. The Company served 61 homes in 2024, 63 homes less than the previous year, resulting in a decrease to all measurements as shown in Figure 2: Low-Income Incentive Program Participation Levels 2022-2025. The company served 89 homes in 2025, resulting in a year-over-year increase of 28 homes.

Figure 2: Low-Income Incentive Program Participation Levels 2022-2025



*Based on carbon offset of 0.00531 metric tons of CO₂e per therm from the 2023 IRP, which includes end use and upstream emissions, calculated as metric tons of CO₂e avoided.

Table 10: Low-Income Programmatic Costs shows the total spending for the WIP in the 2024-2025 biennium.

Table 10: Low-Income Programmatic Costs

Total Costs *	2024	2025	Biennium
Total WIP Incentives	\$521,996	\$1,426,858	\$1,948,854
Total EWIP Incentives	\$427,617	N/A**	\$427,617
20% Project Coordination***	\$27,750	N/A	\$27,750
30% Project Coordination	\$243,259	\$428,057	\$671,316
10% Indirect Rate****	\$94,961	\$142,686	\$237,647
Cascade Admin (Including Program Outreach)*****	\$312,000	\$377,000	\$689,000
Total Project Costs with Agency Admin	\$1,627,583	\$2,376,001	\$4,003,584
Estimated Spend	\$1,836,765	\$2,069,564	\$3,906,329
Percent to Goal	89%	115%	102%

*The Low-Income Program does not fall under the same cost-effectiveness criteria as the rest of the portfolio, and while both the UCT and TRC are provided in 230937-CNGC-2024-2025-Biennium-Conservation-Arpt-WP-4-06-11-2026.xlsx, they are not included in the full portfolio cost-effectiveness calculation

**Program no longer has EWIP

***Cost associated with project management and oversight, including, but not limited to, L&I fees, income verification, energy assessments, quality control inspections, and overall Agency time required to coordinate with CNGC customers

****Covers an Agency's overhead (i.e., costs to keep the organization running)

*****Reflects Cascade staff time and funding for weatherization outreach support; does not include Project Coordination fee or Indirect Rate

Total therm savings for Cascade's Low-Income Program for 2024-2025 were 30,591 therms. The Company's 2024-2025 BCP initial estimate 41,087 therms would be saved through this Program in 2024-2025.

The Low-Income Program's 2024-2025 biennium spending of \$4,003,584 was 102% to budget. The actual homes served in 2024 represented 58% of estimates provided by the Agencies and 2025 saw Agencies serve 102% of their estimated homes. In 2025, some Agencies acquired additional resources (e.g., weatherization general contractors) that increased capacity in areas that CAAs have been struggling with in previous years, allowing for a year-over-year increase. Cascade expects this upward trend to continue in 2026-2027, with preliminary forecasts showing 73 and 78 projects in each year of the next biennium, respectively.

The 2024 incentive budget forecasted in the 2024-2025 BCP of \$2,292,747 assumed a per home cost of \$13,120 whereas actual spending in 2024 was \$22,219 per home and 2025 saw a per home cost increase to \$24,732. This divergence in cost per home is due to the many challenges associated with providing weatherization to vulnerable communities. Agencies continue to experience staffing shortages and contractor constraints, limiting the availability of both qualified weatherization staff and contractors. As a result, overall capacity remains constrained, reducing the number of projects that can be completed. Cascade continues to engage in all-Agency meetings to learn more about the burdens facing the Agencies and how the WIP can improve to increase participation.

Through continuous engagement with Community Action Agencies (CAAs), Cascade has learned that an adaptive management approach is needed to address persistent barriers to those wanting to participate in the WIP, particularly those related to delivery capacity and customer access. While CAAs remain core program partners, Cascade has observed that competing program priorities and alternative funding streams may constrain consistent WIP participation within the CAA network. To mitigate these barriers and improve service delivery, Cascade is incorporating qualified third-party implementers to supplement existing program infrastructure. This approach is not intending to replace CAAs, but rather to expand overall system capacity and ensure that income-eligible customers are able to access program benefits where they may have been otherwise unserved. CNGC's strategy focuses on addressing capacity constraints by broadening the contractor and implementer network, reducing access barriers for underserved and hard-to-reach customers, and improving program responsiveness through diversified delivery channels. Consistent with UTC guidance on maintaining strong community partnerships, Cascade will continue to prioritize collaboration with CAAs and support their ongoing WIP participation, fund all cost-effective and eligible WIP projects submitted through CAA partners, and remain responsive to opportunities to increase CAA engagement.

Table 11: WIP Measure Highlights outlines measure-level highlights for the WIP, providing a breakdown of achievements by measure, and the portion of Weatherization therm savings for 2024-2025.

Table 11: WIP Measure Highlights

Low Income Weatherization Program Measures					
Weatherization	Measures		Therms		
Insulation	2024	2025	2024	2025	% Biennial Therm Savings
Ceiling or Attic Insulation	39	55	4,013	4,891	29.11%
Floor Insulation	37	48	2,086	2,725	15.73%
Wall Insulation	20	28	1,543	1,562	10.15%
Duct Insulation	28	28	702	984	5.51%
Other Weatherization	Measures		Therms		
Duct Sealing	29	29	2,233	2,233	14.60%
Infiltration Reduction	44	67	572	871	4.72%
Subtotals	197	255	11,149	13,265	79.81%
Equipment Upgrades	Measures		Therms		
95%+ Furnace	21	19	2,331	2,109	14.51%
Furnace Tune Up	6	16	126	336	1.51%
91+ UEF Tankless Water Heater	9	4	486	216	2.29%
64+ UEF Storage Water Heater	4	8	132	264	1.29%
Water Heater Insulation	6	13	38	83	0.40%
Low Flow Faucet Aerator	5	2	35	15	0.16%
Low Flow Showerhead	-	1	-	5	0.02%
Subtotals	51	63	3,148	3,028	20.19%
Residential Totals	248	318	14,297	16,294	100%

Weatherization measures account for 79.8% of total therms for the Low-Income Program in 2024-2025, while 20.2% is due to equipment upgrades. Ceiling insulation, Duct Sealing, Floor Insulation, and Furnaces are the top measures for 2024-2025. This remains consistent with the 2022-2023 biennium, where weatherization measures accounted for 69% of therm savings and equipment measures for 31% of all therm savings for the Low-Income Program.

Cascade is in the community to serve. The cost of delivering weatherization services to those who need it most is increasing. The Low-Income Weatherization Program is crucial to the Company's mission to assist the historically disadvantaged communities within its territory.

In fall of 2023, the Cascade Arrearage Relief and Energy Savings (“CARES”) low-income bill assistance program was implemented. Cascade worked to streamline processes and seek auto enrollment and direct referral opportunities to increase participation in its WIP Program in 2024. The CARES program quickly became a consistent source of referrals for the WIP: by March 2024, the Program saw over 700 referrals. The unexpected influx of referrals identified Agency bandwidth barriers.

As a response to growing need in the community, careful consideration and review of potential bottlenecks, Cascade sought to revise the WIP in September 2024 and allow for third-party administration. A related pilot is discussed in greater detail on Page **. The proposed revisions were brought forward and resulted in a pilot-parameter outline. This document was a direct result of the following communications with Agencies and other interested parties, including customer representatives from vulnerable populations, Commission Staff, The Energy Project (“TEP”), and the Washington State Department of Commerce:

September 9, 2024	Discussed the unmet need with WIP referrals with Cascade’s Equity Advisory Group
September 10, 2024	Draft pilot plan provided to all CAG members (includes Agencies, TEP, and Commission Staff)
September 17, 2024	Meeting on pilot plan with TEP
September 26, 2024	Received written comments from TEP
September 27, 2024	Meeting with Commission Staff and Department of Commerce to discuss draft pilot plan, which was significantly revised as a result of this meeting
October 2, 2024	Emailed a draft tariff filing including the revised WIP pilot plan to CAG
October 11, 2024	Presented WIP pilot plan to the Equity Advisory Group
October 23, 2024	Meeting with CAG on revised WIP pilot plan
December 12, 2024	Cascade met with TEP to discuss the WIP pilot
January 7, 2025	TEP provided written feedback

Evaluation, Measurement, & Verification

In August of 2022, Cascade distributed a Request for Proposal (RFP) for third-party measure level Evaluation, Measurement, and Verification (EM&V) of the Program to build on historic, internal evaluation efforts, as outlined in section 9c of the condition’s documents for docket UG-210838:

“Cascade must perform EM&V annually on a maximum four-year schedule of selected programs such that, over the EM&V cycle, all major programs are covered. The EM&V function includes impact, process, market, and cost test analyses. The results must verify the level at which claimed energy savings have occurred, evaluate the existing internal

review processes, and suggest improvements to the program and ongoing EM&V processes.”

Following the RFP, the contract for this work was awarded to ADM Associates, Inc. on December 1st, 2022. Collaborations with ADM in December centered around specifying the goals and timelines for EM&V activities, expediting a thorough vendor security review, and outlining datasets and required supplementary files.

The C/I Program was selected to be reviewed in the first-year schedule of impact EM&V activities. Research areas for the Program included space heating, water heating, building envelope, food service, custom projects, and participant surveying. A final report was filed on September 15th, 2023, in docket UG-210838, showing an overall realization rate of 95% for these measures, which meets the typical realization rate of 80% to 110% for similar measures. Additionally, 93% of responding customers were satisfied or very satisfied with the Program overall, and 95% were satisfied with CNGC as their natural gas provider. Updated deemed therm savings estimates, Program offering suggestions, and enhanced data capturing have all resulted from this work.

Cascade has continued EM&V efforts through the 2024-2025 biennium. In 2024, ADM Associates, Inc. conducted an impact evaluation for Cascade’s residential equipment measures for the years 2018-2022. Research areas included space heating, water heating, thermostats, and clothes washers. A final report was filed on September 13th, 2024, in docket UG-210838, showing a realization rate of 121.1% and total verified savings of 1,293,451 therms. These outstanding findings are a testament to the Program’s success and provide valuable insights for further improvement.

Additionally, Cascade completed a biennial process review, per requirements in section 9d of the conditions document for docket UG-210838, which involves thorough participant and non-participant surveying, program partner interviews, as well as document and process reviews to improve future program implementation. A final report was filed on September 13th, 2024, in docket UG-210838. ADM Associates, Inc. found for Existing Homes participants 49.2% of participants cited their contractors as their initial source of information, highlighting the importance of the Trade Ally Point of Sale Program. Overall, the majority of participants across various segments expressed satisfaction with the application process, indicating that the Program has successfully designed a user-friendly process for most users.

A complete residential envelope study was filed in docket UG-210838 on December 23rd, 2025, including both individual and bundled measure analyses. The overall single-measure realization rate was 100.9%, indicating the program saved a similar quantity of therms to claimed in these measures from 2018 to 2024. Cascade also conducted

additional bundled measure analysis for the first time, with realization rates resulting between 42% and 141% for a variety of installed weatherization combinations. Cascade will utilize this newfound information from increasingly prevalent multi-measure installations for future program improvement in potential assessments, measure installation requirements, and encouraging a whole-home weatherization approach to best serve our customers. Cascade is currently evaluating its Low-Income Weatherization Program, with a final report to be filed in 2026 concluding the current four-year evaluation cycle.

Recommendations from all four filed EM&V reports have provided Cascade with updated deemed therm savings estimates, Program offering suggestions, enhanced data capturing, along with ways to improve the customer experience and reach potential customers in new ways. Cascade intends to collaborate with the CAG in 2026 to develop another evaluation strategy for the upcoming four-year cycle.

Outreach

Executive Summary

In 2024-2025, Cascade Natural Gas Corporation's Energy Efficiency (EE) Outreach Program achieved significant milestones in customer engagement and Program awareness. The Company successfully executed a strategic shift toward data-driven, scalable outreach strategies, while maintaining effective, traditional outreach channels. Notable innovations included the comprehensive implementation of QR codes across all outreach materials, creating seamless digital pathways for customers and providing unprecedented analytics capabilities, and the launch of interactive quiz technology that guided customers to take energy efficient actions. By balancing these digital advancements with proven conventional methods, Cascade was able to reach more customers with targeted messaging about energy efficiency benefits and available incentives.

Strategic Focus Areas

Cascade's 2024-2025 outreach strategy emphasized data-driven decision making to optimize campaign performance across channels. Digital tracking codes were implemented across most outreach channels to better measure campaign effectiveness and inform future resource allocation. This digital-first approach enhanced customer accessibility, meeting customers where they are in their daily-digital interactions. Print advertising targeted high-value regional publications to reach key demographics, particularly in areas where traditional media consumption remains strong. In line with the

Company's commitment to being in the community to serve, Cascade participated in in-person events to educate communities about the benefits of energy efficiency.

The following summary details these initiatives, providing insights into Cascade's Residential, Commercial, and Low-Income outreach efforts. Each section highlights specific strategies, metrics, and outcomes that contributed to Cascade's overall program success in 2024-2025.

Residential Outreach Initiatives

Digital Campaign Performance

The digital landscape continues to be a primary channel for connecting with customers. In 2024-2025, the Company's website traffic showed notable growth with significant increases in unique pageviews to Energy Efficiency pages compared to 2023. This growth demonstrates the effectiveness of Cascade's coordinated digital strategy across multiple platforms.

The Company's website served as the central hub for Program information in 2024-2025, generating over 55,000 pageviews across the Energy Efficiency pages. The commercial rebate offerings page was the most visited content with 22,837 views, followed by the residential rebate offerings page (21,692 views) and residential rebate application page (9,248 views). The fourth quarter showed particularly strong growth compared to earlier periods, with October-December maintaining consistently high traffic levels. These increased views directly correlate with the Company's increased outreach spending.

Figure 3: Website Traffic Growth shows a sharp increase in Residential Application views (orange bar, right Y-axis) in September 2024, attributed to the onset of the heating season.

Figure 3: Website Traffic Growth



Figure 4: 2025 Web Content Views shows view counts for the top-viewed pieces of content hosted on Cascade’s website. Eight of these items are bill inserts, indicating the efficacy of including helpful content with customer bills.

Figure 4: 2025 Web Content Views

Incentives Sheet (FULL) (APPLY NOW) (FRONT&BACK) https://www.cngc.com/energy-efficiency/residential-rebate-offerings/residenti...	1093
Residential Application (MIDDLE (Incentives Sheet)) https://www.cngc.com/wp-content/uploads/PDFs/Conservation/2025/CNGC-2025-...	943
2024 Residential Application QR Code (TOP) (Apply Online) https://www.cngc.com/energy-efficiency/residential-rebate-offerings/resid...	872
2025 May Bill Insert (Got an attic?) https://6z9ebhzvd2g.typeform.com/to/Hy5wYGmO	607
July Bill Insert 2025 https://www.cngc.com/wp-content/uploads/PDFs/Conservation/2025/CNGC-2025-Residential-Rebate-Offerings.pdf	528
2025 March EE Bill Insert https://6z9ebhzvd2g.typeform.com/to/Hy5wYGmO	417
2025 June Bill Insert https://6z9ebhzvd2g.typeform.com/to/Hy5wYGmO	405
October Bill Insert 2025 https://www.cngc.com/wp-content/uploads/PDFs/Conservation/2025/CNGC-2025-Residential-Rebate-Offerings...	374
2025 September Bill Insert https://www.cngc.com/wp-content/uploads/PDFs/Conservation/2025/CNGC-2025-Residential-Rebate-Offeri...	275
2025 April Bill Insert https://6z9ebhzvd2g.typeform.com/to/Hy5wYGmO	262
August Bill Insert 2025 https://www.cngc.com/wp-content/uploads/PDFs/Conservation/2025/CNGC-2025-Residential-Rebate-Offerings....	228
Feb Bill Insert 2025 https://www.cngc.com/energy-efficiency/residential-rebate-offerings/	211

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Interactive Education Tech

The implementation of quiz software, an interactive assessment platform that empowers customers to validate and deepen product knowledge through structured, real-time quizzes, transformed passive content consumption into active engagement across CNGC channels. Customers scanning QR codes accessed interactive assessment tools providing personalized recommendations based on their specific home situation. Figure 5: 2024 Quiz Software Engagement and Figure 6: 2025 Quiz Software Engagement illustrates the engagement data for the Residential EE Rebate Qualifier (General), highlighting a high completion rate and a short completion time.

Figure 5: 2024 Quiz Software Engagement

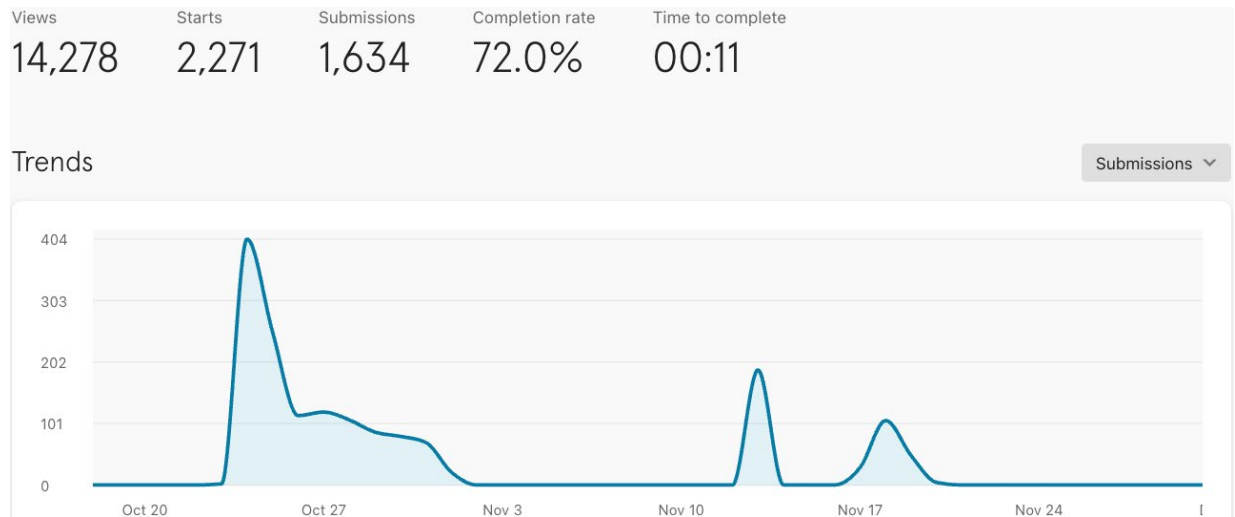
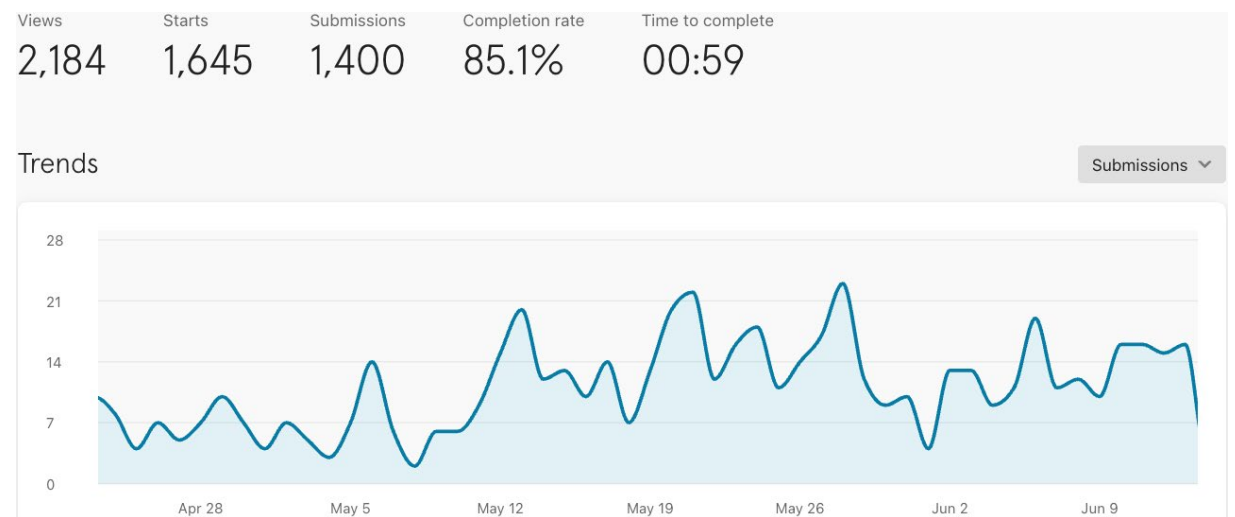


Figure 6: 2025 Quiz Software Engagement



QR Code Analytics & Customer Journey

In 2024-2025, Cascade integrated QR codes across all outreach channels, connecting previously isolated touchpoints into a cohesive customer journey. Each code was uniquely generated for specific campaigns and locations, enabling precise attribution of engagement to particular outreach efforts. As shown in Figure 7: 2024-2025 QR Code Customer Interaction, the resulting analytics revealed timing patterns, regional response variations, and message effectiveness, while significantly enhancing the customer experience through seamless transitions between physical and digital touchpoints.

Figure 7: 2024-2025 QR Code Customer Interaction

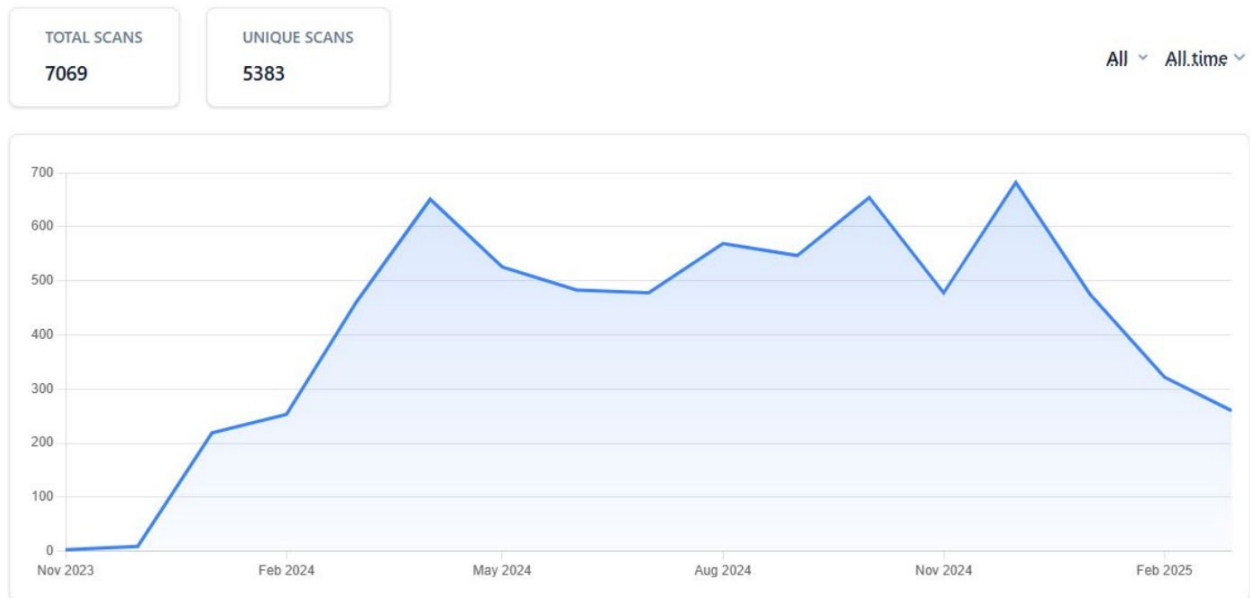
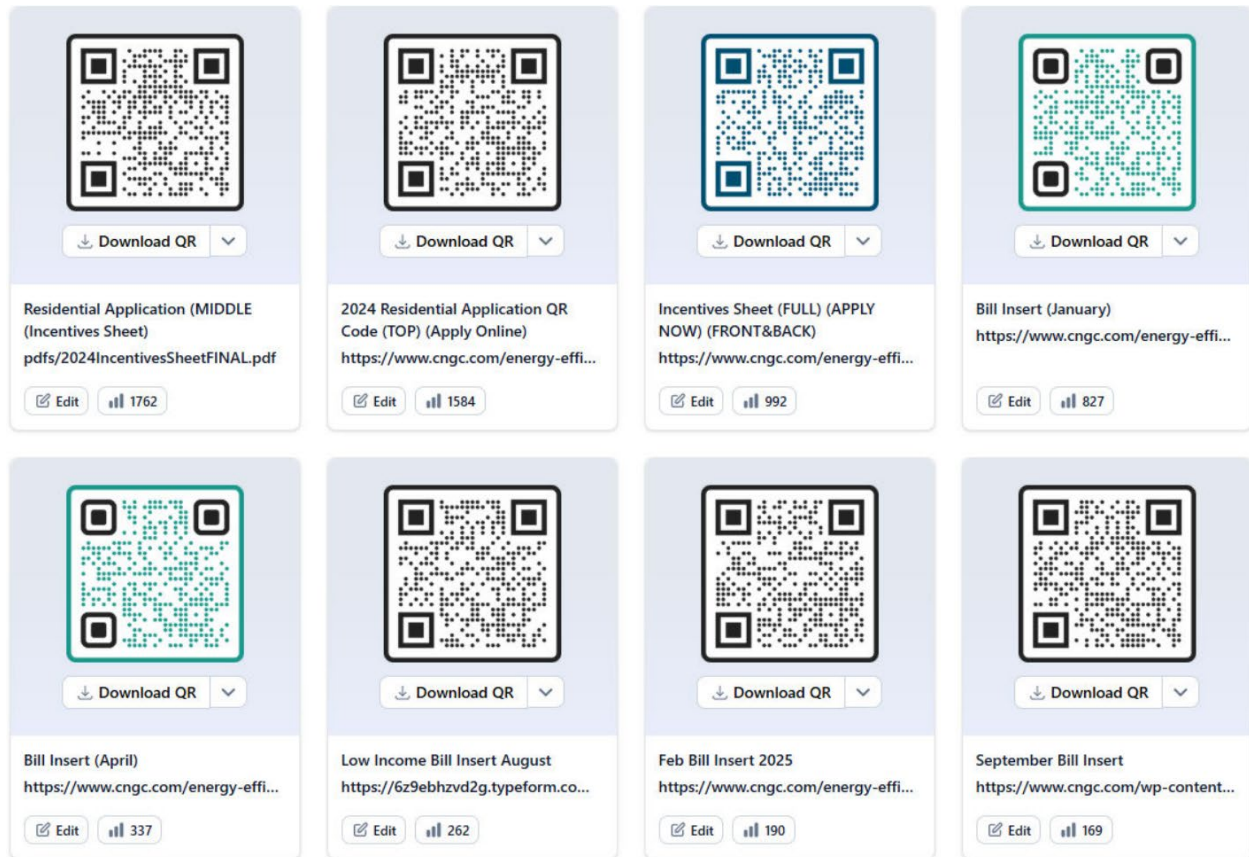


Figure 8: 2024-2025 QR Code Samples depicts examples of QR codes distributed to customers and the correlating outreach campaign for data mining purposes.

Figure 8: 2024-2025 QR Code Samples



Video & Streaming Content

The Company's streaming campaigns reached target audiences through Connected TV and pre-roll placements, delivering impressions that exceeded campaign targets while maintaining cost efficiency. 2024 completion rates, shown in Figure 9: 2024 Ad Completion Rate, outperformed industry benchmarks, indicating strong content relevance. These assets were deployed across multiple channels for consistent and broad messaging.

Figure 9: 2024 Ad Completion Rate

April performance gave us 132,402 total ads served to your target audience with an outstanding average completion rate 99.1%, 130,400+ completes and 11clicks

Ad Groups	57	Ads	CPM	Clicks	CTR	Completed Listens	LTR
Cascade Natural Gas "CNGC Residential Energy Efficiency"_Apr Aug 2024		132,402	\$ 26.42	11	0.01%	130,451	99.1%
Streaming Audio Eng.		115,703	\$ 26.88	3	0.00%	113,920	99.2%
Streaming Audio Sp.		16,699	\$ 23.24	8	0.05%	16,531	98.4%
Grand Total		132,402	\$ 26.42	11	0.01%	130,451	99.1%

In the fourth quarter of 2025, Cascade engaged in an additional Connected TV advertising campaign, targeting homeowners ages 35 and older. As part of this campaign, 214,402 impressions were delivered, with a completion rate of 98.7%; this translates to 211,615 impressions being watched through completion. 100% of the content delivered was done through televisions, meaning none of the impressions were viewed on other devices, such as phones, tablets, and computers. 62% of the impressions were delivered during live programming, which has several benefits, such as viewers being in a higher state of attention. For comparison, this campaign was able to reach approximately five times the amount of potential customers compared to a similar streaming advertisement campaign in the previous biennium.

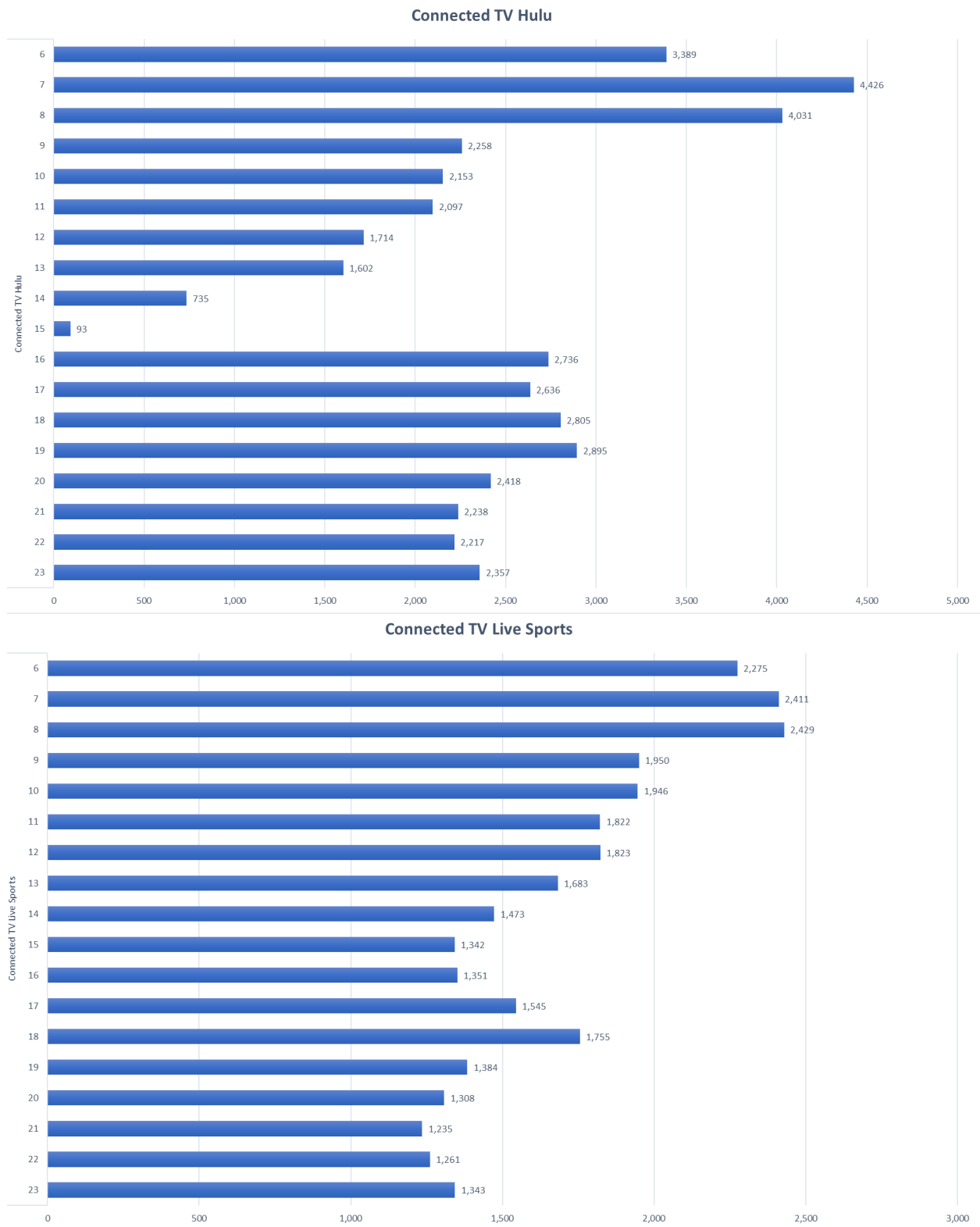
Figure 10: 2025 Impression Completion Rate

Ad Groups	Impressions	CPM	Completed Views	VCR
Cascade Natural Gas "CTV Residential" _Oct Dec 2025	214,402	\$ 33.95	212,055	98.7%
Connected TV Hulu	42,800	\$ 44.16	42,387	99.0%
Connected TV Live Sports	30,336	\$ 43.81	29,691	97.4%
Connected TV Standard Portfolio	104,007	\$ 26.25	103,003	98.9%
Connected TV Tier 1	37,259	\$ 35.69	36,974	99.1%
Grand Total	214,402	\$ 33.95	212,055	98.7%

Figure 11: 2025 Impression Reach & Frequency

Reach & Frequency	Impressions	Unique Households	Freq. / Household	Unique IDs	Freq. / Unique ID	Unique Persons	Freq. / Person
Connected TV Hulu	42,800	21,011	2	23,337	2	21,210	2
Connected TV Live Sports	30,336	12,460	2	13,203	2	12,764	2
Connected TV Standard Portfolio	104,007	36,548	3	37,853	3	37,853	3
Connected TV Tier 1	37,259	23,648	2	24,790	2	24,790	2

Figure 12: 2025 Impression Count by Channel by Time-of-Day Delivery



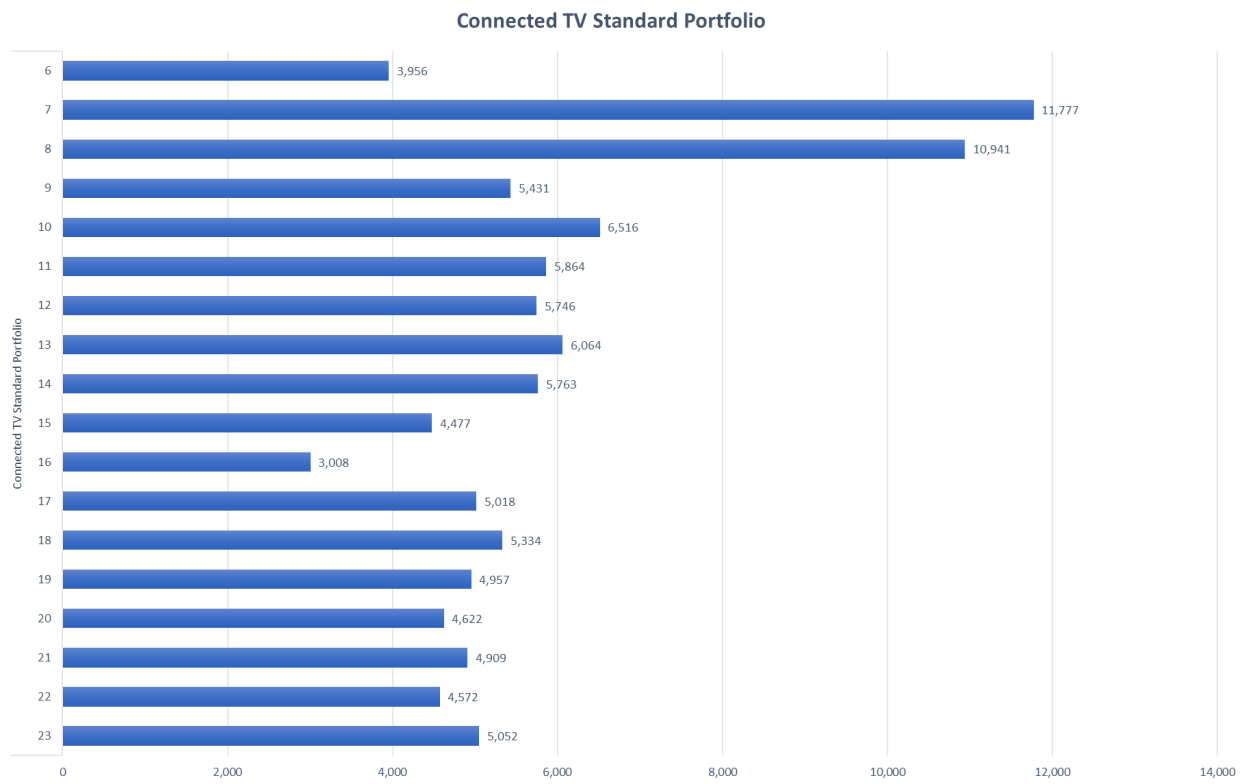


Figure 13: 2025 Impressions by Day of Week Delivery

Day of Week Performance	Impressions	CPM	VCR	Completed Views
Cascade Natural Gas "CTV Residential"_Oct Dec 2025	214,402 \$	33.95	98.8%	212,055
Connected TV Hulu	42,800 \$	44.16	99.0%	42,387
Sunday	6,584 \$	44.89	99.0%	6,521
Monday	6,272 \$	43.89	99.1%	6,217
Tuesday	5,365 \$	43.94	99.1%	5,316
Wednesday	5,861 \$	44.23	98.8%	5,797
Thursday	5,513 \$	43.72	98.7%	5,447
Friday	5,725 \$	44.08	98.8%	5,665
Saturday	7,480 \$	44.21	99.2%	7,424
Connected TV Live Sports	30,336 \$	43.81	97.5%	29,691
Sunday	3,547 \$	42.10	98.2%	3,495
Monday	4,406 \$	46.77	97.7%	4,310
Tuesday	4,246 \$	43.03	97.4%	4,151
Wednesday	4,511 \$	43.60	97.3%	4,398
Thursday	4,150 \$	42.90	97.7%	4,076
Friday	4,583 \$	43.92	97.2%	4,471
Saturday	4,893 \$	43.93	97.6%	4,790
Connected TV Standard Portfolio	104,007 \$	26.25	98.9%	103,003
Sunday	11,751 \$	30.35	98.7%	11,614
Monday	16,970 \$	25.48	98.5%	16,735
Tuesday	16,762 \$	24.05	99.1%	16,632
Wednesday	16,685 \$	23.78	99.0%	16,519
Thursday	14,777 \$	25.34	99.0%	14,661
Friday	13,527 \$	28.49	99.0%	13,417
Saturday	13,535 \$	28.17	98.9%	13,425
Connected TV Tier 1	37,259 \$	35.69	99.1%	36,974
Sunday	4,843 \$	35.54	99.1%	4,805
Monday	5,780 \$	36.44	99.1%	5,735
Tuesday	5,584 \$	35.40	98.9%	5,526
Wednesday	5,401 \$	35.12	99.0%	5,353
Thursday	5,082 \$	35.64	99.1%	5,049
Friday	5,560 \$	35.46	99.4%	5,531
Saturday	5,009 \$	36.22	99.1%	4,975
Grand Total	214,402 \$	33.95	98.8%	212,055

Figure 14: 2025 Impression by Geographic Location

Top Cities	TV	Impressions	CPM	VCR	Completed Views
Cascade Natural Gas "CTV Residential" _Oct Dec 2025		128,319 \$	34.02	98.7%	126,931
Connected TV Standard Portfolio		62,026 \$	26.17	98.9%	61,421
Yakima		11,313 \$	25.78	98.8%	11,196
Kennewick		8,215 \$	26.21	99.1%	8,157
Pasco		6,876 \$	26.37	98.6%	6,783
Marysville		5,896 \$	25.49	98.6%	5,829
Longview		5,612 \$	25.52	99.3%	5,573
Port Orchard		5,310 \$	27.06	98.9%	5,263
Moses Lake		5,059 \$	25.82	98.8%	5,003
Bellingham		4,725 \$	27.11	98.9%	4,673
Bremerton		4,572 \$	26.75	99.2%	4,546
Richland		4,448 \$	26.20	98.7%	4,398
Connected TV Hulu		26,485 \$	44.11	98.9%	26,256
Yakima		4,378 \$	43.96	98.9%	4,342
Kennewick		3,439 \$	43.95	98.7%	3,401
Pasco		2,951 \$	44.20	98.9%	2,923
Port Orchard		2,651 \$	43.87	98.9%	2,628
Moses Lake		2,611 \$	44.25	99.5%	2,598
Richland		2,371 \$	44.23	98.9%	2,344
Marysville		2,225 \$	44.16	99.0%	2,208
Longview		2,109 \$	44.32	99.1%	2,092
Bellingham		2,078 \$	44.18	99.1%	2,063
Bremerton		1,672 \$	44.32	98.7%	1,657
Connected TV Tier 1		20,798 \$	35.79	99.2%	20,668
Yakima		3,795 \$	35.73	99.6%	3,785
Bellingham		2,159 \$	35.92	99.0%	2,145
Bremerton		1,987 \$	35.70	99.4%	1,978
Marysville		1,975 \$	35.68	98.6%	1,950
Pasco		1,951 \$	35.89	99.3%	1,940
Kennewick		1,905 \$	35.97	99.9%	1,903
Longview		1,889 \$	36.02	99.4%	1,885
Port Orchard		1,889 \$	35.57	98.0%	1,853
Richland		1,733 \$	35.84	99.7%	1,728
Moses Lake		1,515 \$	35.56	99.3%	1,501
Connected TV Live Sports		19,010 \$	43.62	97.5%	18,586
Yakima		3,748 \$	41.61	98.3%	3,689
Pasco		2,703 \$	43.44	98.5%	2,666
Kennewick		2,506 \$	45.27	96.4%	2,425
Moses Lake		2,275 \$	41.98	97.5%	2,223
Richland		1,568 \$	44.99	99.2%	1,562
Wenatchee		1,559 \$	43.56	96.8%	1,524
Port Orchard		1,217 \$	46.61	97.3%	1,192
Marysville		1,201 \$	44.00	94.3%	1,140
Walla Walla		1,186 \$	42.60	98.1%	1,165
Bellingham		1,047 \$	46.08	95.4%	1,000
Grand Total		128,319 \$	34.02	98.7%	126,931

Promotional Materials

Various promotional tools, like bill inserts and direct mailers, were effectively used to communicate the benefits of EE Programs to Cascade's customer base. Bill inserts have the unique opportunity of associating energy and monetary savings directly with the customer's bill. Cascade has placed an enhanced emphasis on bill inserts for all subsets of the Program in the upcoming biennium.

Print & Traditional Media

The Company's presence was maintained via strategic print placements in key publications across our service territory. Cascade's approach balanced broad awareness

with targeted messaging, optimizing cost-per-impression metrics while maintaining visibility. This messaging provided general education for energy efficiency.

Figure 15: Whatcom County House Show QR Ad

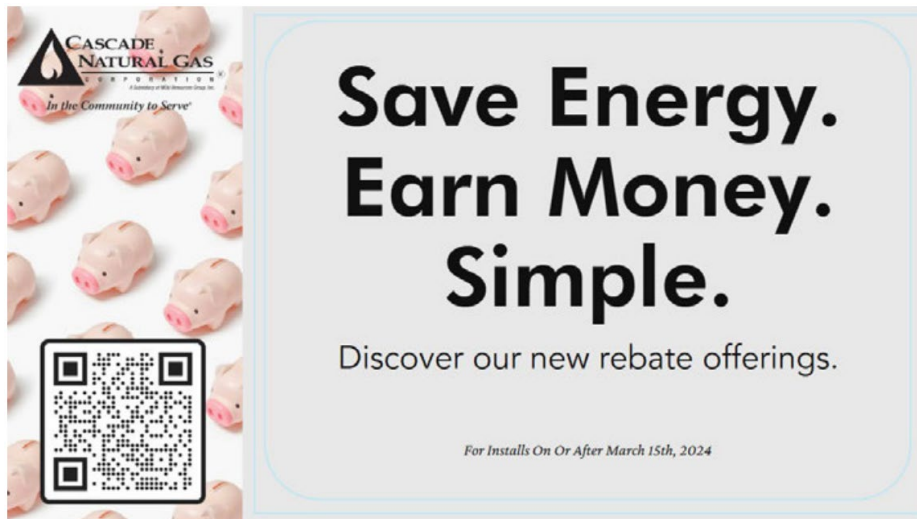
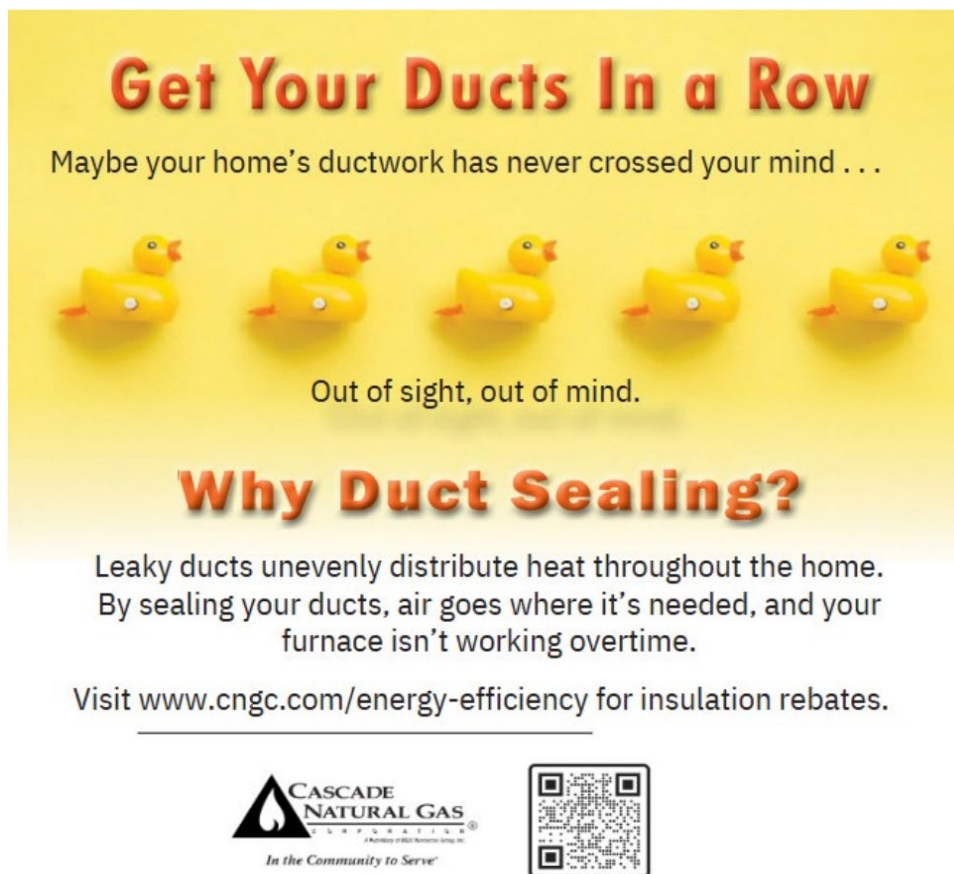


Figure 16: Print Advertisement



Community Engagement

Bill inserts remained one of Cascade's most cost-effective outreach channels in 2024-2025, with messaging published in both English and Spanish, and other languages, such as Ukrainian, available by request. While no requests were received during this biennium, Cascade continues to be proactive in making non-English content available. Multiple campaigns were strategically timed to align with seasonal energy usage patterns, with QR codes creating seamless paths to digital engagement. Website traffic showed notable spikes following bill insert delivery.

Figure 17: English Bill Insert



Figure 18: Spanish Bill Insert



Figure 19: CARES Messaging (English, Spanish, Ukrainian)



**WASHINGTON
COMMUNITY ACTION
AGENCY DIRECTORY**
*WASHINGTON DIRECTORIO DE AGENCIAS
DE ACCIÓN COMUNITARIA*

If you are having difficulty paying your natural gas bill, Cascade Natural Gas and our Community Action agency partners may be able to help through the CARES program by providing qualifying customers with a discount on their monthly gas bill, plus helping with past due balances, if needed. The CARES program:

- Features five tiers of discounts with each tier offering a different discount rate based on the customer's household income and number of residents in their household.
- The arrearage relief component offers qualifying customers with past-due balances arrearage relief assistance up to \$500.
- The amount of assistance for past due balances is based on the customer's income and number of residents in their household.
- Assistance levels range from 50%-100% of the past due balance.
- Time Payment arrangements are available for any remaining balances after the arrearage relief grant is applied.
- Customers receiving LIHEAP or Winter Help assistance will be automatically enrolled into the CARES bill discount rate.

Apply by contacting Cascade Natural Gas at 888-522-1130 or use the Community Action agency directory at the right to find the agency serving your community.



Find the directory online at:
www.cngc.com/customer-service/low-income-assistance-programs/#washington.

Cascade's customer service representatives are available to assist you with making payment arrangements or connecting with your Community Action agency to fill out an application for financial aid. Call Cascade Natural Gas at 888-522-1130.

COASTAL COMMUNITY ACTION PROGRAM
 101 E Market St., Aberdeen, WA 98520-0304 – Grays Harbor County
 800-828-4883 | 360-533-5100 | www.coastalcap.org

OPPORTUNITY COUNCIL
 1111 Cornwall Avenue, Bellingham, WA 98225 – Whatcom County
 360-255-2192 | www.opcco.org/energy-scheduling

KITSAP COMMUNITY RESOURCES
 845 8th St, Bremerton, WA 98337 – Kitsap County
 360-479-1507 | www.kcr.org/energy

SNOHOMISH COUNTY HUMAN SERVICE DEPARTMENT
 3000 Rockefeller Avenue, Everett, WA 98201 – Snohomish County
 425-388-3880 | snohomishcountywa.gov/552/Energy-Assistance

COMMUNITY ACTION COUNCIL OF LEWIS, MASON & THURSTON CO.
 807 W Railroad Ave, Shelton, WA 98584 – Mason County
 800-878-5235 | 360-426-9726 | www.cacimt.org

COMMUNITY ACTION CONNECTIONS (CAC)
 720 W. Court Street, Pasco, WA 99301 – Franklin County
 509-545-4042 | Prosser: 509-786-3379 | www.bfcac.org

LOWER COLUMBIA COMMUNITY ACTION PROGRAM
 1526 Commerce Avenue, Longview, WA 98632 – Cowlitz County
 800-383-2101 | 360-425-3430 | www.lowercolumbiacap.org

OIC OF WASHINGTON
 309 5th Ave, Moses Lake, WA 98837 – Grant County
 509-955-7100 | 509-765-9206 | www.yvoic.org

COMMUNITY ACTION AGENCY OF SKAGIT COUNTY
 330 Pacific Place, Mount Vernon, WA 98273 – Skagit County
 360-416-7585 | www.communityactionskagit.org

OPPORTUNITY COUNCIL OF OAK HARBOR
 231 SE Barrington Dr, Ste 100, Oak Harbor, WA 98277 – Island County
 360-679-6577 | www.opcco.org/energy-scheduling

NORTHWEST COMMUNITY ACTION CENTER
 706 Rentschler Lane, Toppenish, WA 98948 – South Yakima County
 509-865-7630 | www.yvfwc.com/service/energy-assistance

BLUE MOUNTAIN ACTION COUNCIL
 8 E Cherry Street, Walla Walla, WA 99362 – Walla Walla County
 509-529-4980 | www.bmacww.org

CHELAN-DOUGLAS COMMUNITY ACTION COUNCIL
 620 Lewis Street, Wenatchee, WA 98801 – Chelan County
 509-662-6156 | www.cdacac.org/energy-assistance

OIC OF WASHINGTON
 815 Fruitvale Boulevard, Yakima, WA 98902 – North Yakima County
 509-452-7145 | 509-955-7100 | www.yvoic.org



**CASCADE
NATURAL GAS**
CORPORATION®
A Subsidiary of NEXUS Resources Group, Inc.

In the Community to Serve™



www.cngc.com



Cascade Alivio de Facturas Vencidas y Ahorro de Energía

Si tiene dificultades para pagar su factura de gas natural, Cascade Natural Gas y nuestras agencias de Acción Comunitaria asociadas pueden ayudarle a través del programa CARES, ofreciendo a los clientes que califiquen un descuento en su factura mensual de gas, además de ayudarles con los saldos vencidos, si es necesario. El programa CARES:

- Ofrece cinco niveles de descuento, cada uno con una tasa de descuento diferente según los ingresos del hogar y el número de residentes.
- El componente de alivio de atrasos ofrece a los clientes que califican con saldos vencidos una asistencia de hasta \$500.
- El monto de la asistencia para saldos vencidos se basa en los ingresos del cliente y el número de residentes.
- Los niveles de asistencia varían entre el 50% y el 100% del saldo vencido.
- Se ofrecen acuerdos de pago a plazos para cualquier saldo restante después de aplicar la subvención de alivio de atrasos.
- Los clientes que reciben asistencia de LIHEAP o Ayuda de Invierno se inscribirán automáticamente en la tasa de descuento de facturas de CARES.

Solicite comunicándose con Cascade Natural Gas al 888-522-1130 o utilice el directorio de agencias de Acción Comunitaria a la derecha para encontrar la agencia que presta servicios en su comunidad.



Encuentre el directorio en línea en:
www.cngc.com/customer-service/low-income-assistance-programs/#washington.

Los representantes de servicio al cliente de Cascade están disponibles para ayudarle a coordinar pagos o a contactar a su agencia de Acción Comunitaria para completar una solicitud de ayuda financiera. Llame a Cascade Natural Gas al 888-522-1130.

WASHINGTON DIRECTORIO DE AGENCIAS DE ACCIÓN COMUNITARIA

COASTAL COMMUNITY ACTION PROGRAM

101 E Market St., Aberdeen, WA 98520-0304 – Grays Harbor County
800-828-4883 | 360-533-5100 | www.coastalcap.org

OPPORTUNITY COUNCIL

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425-388-3880 | snohomishcountywa.gov/552/Energy-Assistance

COMMUNITY ACTION COUNCIL OF LEWIS, MASON & THURSTON CO.

807 W Railroad Ave, Shelton, WA 98584 – Mason County
800-878-5235 | 360-426-9726 | www.cacmt.org

COMMUNITY ACTION CONNECTIONS (CAC)

720 W. Court Street, Pasco, WA 99301 – Franklin County
509-545-4042 | Prosser: 509-786-3379 | www.bfcac.org

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NORTHWEST COMMUNITY ACTION CENTER

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OIC OF WASHINGTON

815 Fruitvale Boulevard, Yakima, WA 98902 – North Yakima County
509-452-7145 | 509-955-7100 | www.yvoic.org



En La Comunidad Para Servir®

www.cngc.com



Cascade Arrearage Relief and Energy Savings

Якщо у вас виникли труднощі з оплатою рахунків за природний газ, Cascade Natural Gas і наші партнери-агентства Community Action готові допомогти з рішеннями програми CARES.

- Надає відповідним клієнтам, які потребують допомоги в оплаті рахунків, знижку на щомісячний рахунок за газ, а також допомагає з простроченими залишками, якщо це необхідно.
- Містить п'ять рівнів знижок, кожен з яких пропонує різну ставку дисконту залежно від доходу домогосподарства клієнта та кількості мешканців у його сім'ї.
- Компонент погашення заборгованості пропонує відповідним клієнтам із простроченими залишками отримати допомогу з погашення заборгованості в розмірі до 1000 доларів США.
- Сума допомоги на прострочені суми залежить від доходу клієнта та кількості мешканців у його родині.
- Рівні допомоги коливаються від 50% до 100% простроченого залишку.
- Угоди про своєчасну оплату доступні для будь-яких балансів, що залишилися після застосування гранту на компенсацію заборгованості.
- Клієнти, які отримують допомогу LIHEAP, WEAF або Winter Help у період з 1.10.2022 р. по 30.09.2023 р., будуть автоматично зараховані до ставки дисконтування рахунків CARES, як тільки це стане можливим після 1 жовтня 2023 р.

Скористайтесь каталогом агентств Community Action справа, щоб знайти агентство, яке обслуговує вашу громаду. Зателефонуйте або відвідайте агентство онлайн, щоб дізнатися, як подати заявку на участь у програмі.

Найдіть каталог в Інтернеті по адресу



**Знайдіть каталог
в Інтернеті за
адресою**

**[www.cngc.com/
customer-service/
low-
income-assistance-programs/#washington](http://www.cngc.com/customer-service/low-income-assistance-programs/#washington)**

Представники служби підтримки клієнтів Cascade готові допомогти вам організувати оплату або зв'язатися з вашим агентством Community Action, щоб заповнити заявку на отримання фінансової допомоги. Телефонуйте в Cascade Natural Gas за номером 888-522-1130.



In the Community to Serve®



Language Access Plan

The Final MYRP Order required Cascade to develop a Language Access Plan. Cascade contracted with Empower Dataworks, Inc. ("Empower") for the development of the plan. Empower met with the CARES Advisory group on May 21, 2025, and with the Equity Advisory Group on May 9, 2025, to collaborate on the concept for the plan. Empower then performed research on Cascade's service territory and customer demographics, reviewed Cascade's communications materials, and interviewed Agencies, Cascade employees, and community representatives. The plan and its corresponding recommendations for improved language

access were presented to the CARES Advisory Group on October 23, 2025, and the Equity Advisory Group on October 20, 2025.

Cascade will work with its two advisory groups on the timing of implementing the recommendations found in Section 3 of the plan. As of the filing of this report, the following recommendations have been implemented:

- Energy Efficiency team evaluated language access of Energy Efficiency program communications
- The Communications team is incorporating universal icons and symbols that are understandable to all speakers of all languages
- The language preference widget was moved to the top right of the CNGC website
- Cascade's Customer Experience Team updated its processes to update a customer's preferred language stored in its customer information system when a Customer Service employee assists a customer in a language other than English (either directly or via the Company's interpreter service)

The PY 2026-2027 CARES Annual Report will include an update on Cascade's progress towards implementing the Language Access Plan action items.

In The Community to Serve

Sports partnerships provided high-visibility exposure across CNGC's service territory, particularly through collaborations with the Bellingham Bells, Walla Walla Sweets, and Yakima Valley Pippins. These local sponsorships provide an opportunity to be in the community and educate on the benefits of energy efficiency. Figure 20: 2024 Bellingham Bells depicts the reach of one of these partnerships Cascade utilized in 2024.

Figure 20: 2024 Bellingham Bells



Cascade's partnership with the Walla Walla Sweets in 2025 saw the Company reach 33,500 fans at the team's home games. Branding presented in the stadium included an outfield fence sign and dugout snap frames. In addition to in-stadium advertising, Cascade was the presenting sponsor for the Sweets' post-game show and the Battle of the Basin Rivalry Series between Walla Walla and Yakima Valley.

Figure 21: 2025 Walla Walla Sweets



Commercial Outreach Initiatives

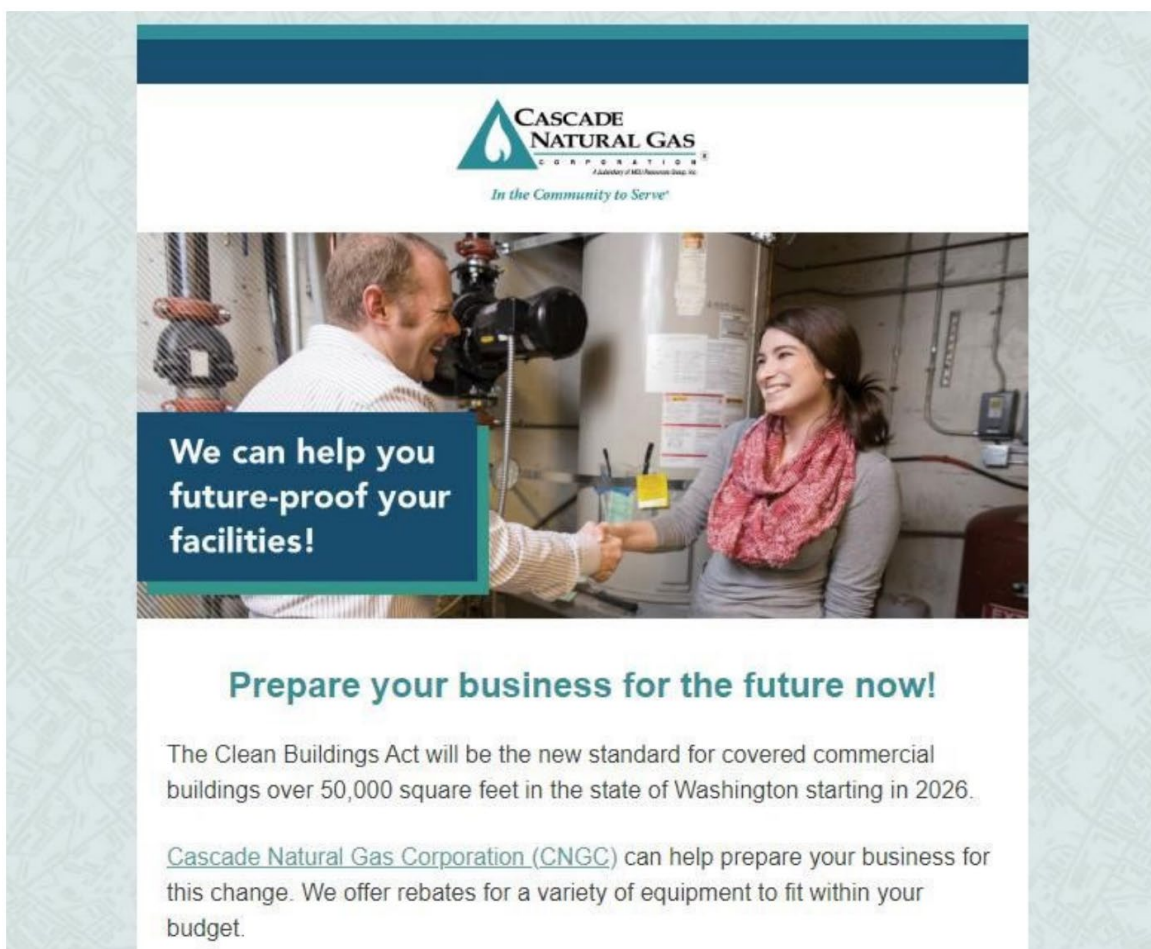
Cascade continued the long-standing partnership with TRC Industries Inc. to further expand outreach to commercial and industrial customers in 2024-2025. Outreach methods for these customers included:

- Targeted Campaigns
- Case Studies
- Print Advertising
- Transit Advertising

Targeted Campaigns

Targeted email campaigns achieved strong engagement metrics throughout 2024-2025. Cascade's Clean Buildings Act preparation email in June 2024, as seen below in Figure 22: CBA Email, received 829 opens, while a Fred Meyer case study email in September 2024 generated 958 opens and 26 clicks to the landing page.

Figure 22: CBA Email



In 2025, emails were sent to 2,000 contacts that recently pulled construction or renovation permits. These emails received an open rate of 41% and a 3% click rate.

Figure 23: Permit Communique





**WE CAN HELP
YOUR BUSINESS
SAVE MONEY
AND ENERGY**

If your facility recently completed a construction or renovation project in Cascade Natural Gas Corporation (CNGC) territory, now is the perfect time to explore rebates that can help you cut costs and improve efficiency.

The CNGC Commercial & Industrial Program offers cash rebates for installing high-performance equipment upgrades, helping you optimize your operating budget while reducing energy use.

Rebates are available for a [variety of upgrades](#), including **heating, food service, weatherization, hot water systems, and more**. To qualify, your facility must be on a participating rate schedule and primarily use natural gas for space or water heating.

Not sure where to start? We offer **no-cost walkthroughs** to help identify efficiency projects that fit your budget.

Get in touch.

For customers in Western Washington:

Let's connect

For customers in Eastern Washington:

Let's connect

Case Studies

The development of compelling case studies proved particularly effective in 2024-2025. The Pasco Fire Station case study highlighted the benefits of energy-efficient heating systems in critical infrastructure, while the Fred Meyer roof insulation project showcased impressive energy savings in the retail sector. These real-world examples were leveraged

across multiple channels, including a dedicated video case study for the Fred Meyer project that was featured on the CNGC YouTube channel and a custom website landing page, as shown in Figure 24: Fred Meyer Case Study.

Figure 24: Fred Meyer Case Study



Print Advertising

The Company's visibility among key business decision makers was maintained via strategic print placements in publications like the Tri-Cities Journal of Business and Yakima Herald. These advertisements featured Cascade's commercial case studies and highlighted specific rebate opportunities, reinforcing CNGC's digital messaging through traditional media channels. Figure 25: Commercial Print Ad is an example of using print advertisements to target commercial customers.

Figure 25: Commercial Print Ad



Transit Advertising

To expand the Company's community presence, bus advertisements were implemented in the Bellingham area, increasing Program visibility across this key market. These high-visibility placements complemented Cascade's digital and print efforts, creating multiple touchpoints for potential commercial customers. This advertisement is shown in Figure 26: Commercial Transit Ad.

Figure 26: Commercial Transit Ad



Strategic Directions for Future Outreach

As Cascade reflected on the achievements and insights gained from our 2024-2025 outreach efforts, there is strategic positioning allowing the Company to further enhance Energy Efficiency Programs. Building on CNGC's data-driven foundation and successful customer engagement strategies, several key focus areas were identified.

Expanded Digital Ecosystem

The integration of QR codes and interactive quiz technology proved transformative in 2024, creating seamless pathways between physical and digital touchpoints. In 2025, Cascade expanded this ecosystem with enhanced personalization capabilities. Moving forward, the Company will seek to make iterative improvements where possible.

Data-Driven Optimization

The robust analytics framework established in 2024-2025 will enable increasingly refined outreach strategies in the coming years. By leveraging insights from QR code scan patterns, website behavior, and quiz response data, the Company will optimize messaging, timing, and channel selection for maximum impact. This approach will allow for more granular audience segmentation and targeted communications that address specific barriers to the adoption of energy efficiency measures identified through CNGC's analytics.

Community Integration

Cascade's successful sports partnerships and print media presence demonstrated the continued importance of community integration. In 2026-2027, the Company will deepen these connections by expanding its presence at community events and developing more localized events. By building on the successful integration of data tracking, digital engagement, and traditional outreach channels, Cascade is well-positioned to enhance Program participation, while delivering an increasingly seamless experience for customers. The 2026-2027 strategy will maintain the balance of innovation and accessibility that has driven past success, ensuring Energy Efficiency Programs remain relevant and valuable to all the communities CNGC proudly serves.

Adaptive Management Strategies

2024 and 2025 were successful years for the Program and each stakeholder should be proud of all that was accomplished. However, Cascade is always seeking opportunities to strengthen and improve the Company's EEIP offerings, delivery, and future strategy. Through collaboration with the CAG and regular reporting of Program performance metrics, the Program observes challenges in real time and uses projections to understand the EEIP's trajectory. Corrective action through adaptive management and collaboration with the CAG is taken when data indicates the Program is likely to deviate from expectations or has found new areas of improvement.

During this biennium, CNGC customers faced increased costs due to inflation and federal tariffs. These increased costs made program participation challenging due to customers having to make decisions about how to invest their limited resources. In addition, a new

channel of unpredictability arose for business owners due to often changing federal tariffs impacting long-standing investment decisions.

Cascade made a variety of improvements in the Program over the 2024-2025 biennium with elaborations provided below. These iterative changes were key drivers in the record performance in cost-effective therm savings achieved in this biennium. One such example of this iterative approach is the multi-phased Home Energy Report Pilot, further discussed in its own section in this report.

Equity Advisory Group

Cascade passionately believes in supporting the 95 communities it serves. Cascade's commitment to its customers is observable in its conservation education, employee volunteerism, corporate giving, academic scholarships, matching funds for employee donations made to local non-profit organizations, environmental stewardships, and community environmental stewardships.

To address inequities in the distribution of energy benefits and barriers to accessing customer service and Company information, Cascade established the Equity Advisory Group (EAG) in the fall of 2023. The EAG is a forum of under-represented and vulnerable customer representatives who meet monthly to discuss the Company's program offerings, communications, and the implementation of equity to Cascade's operations. EAG members have challenged Cascade to reduce barriers to highly impacted communities, increase access to affordable energy for overburdened customers, and ensure the energy future does not disproportionately impact marginalized populations and/or communities.

Collaboration with the EAG has resulted in significant changes within the Company. The EAG has worked with Cascade on addressing language barriers within its public-facing communications. The EAG has also helped shape public engagement, Cascade's bill assistance programs, and the Company's website. Bringing the EAG to the decision-making table has resulted in making communications and services more accessible and is improving the equitable distribution of energy benefits for all of Cascade's customers.

Addressing Accessibility Barriers & Engagement

The Company contracted with Empower Dataworks, Inc. ("Empower") for the development of a Language Access Plan. Empower met with the Equity Advisory Group on May 9, 2025, and with the CARES Advisory group on May 21, 2025, to collaborate on the concept for the plan. Empower performed research on Cascade's service territory and customer demographics, reviewed Cascade's communications materials, and interviewed Agencies, Cascade employees, and community representatives. The plan and its

corresponding recommendations for improved language access were presented to the Cascade Arrearage Relief and Energy Savings (CARES) Advisory Group on October 23, 2025, and the EAG on October 20, 2025.

Cascade continues to work with its two advisory groups on the timing of implementing the recommendations found within the plan. As of the filing of this report, the following recommendations have been implemented:

- The Energy Efficiency team evaluated language access of Energy Efficiency program communications
- The Communications team is incorporating universal icons and symbols that are understandable to all speakers of all languages
- The language preference widget was moved to the top right of the CNGC website
- Cascade's Customer Experience Team updated its processes to update a customer's preferred language stored in its customer information system when a Customer Service employee assists a customer in a language other than English (either directly or via the Company's interpreter service)

The program year (PY) 2026-2027 CARES Annual Report filed in Docket UG-230551 and PY 2025-2026 BCR will include an update on Cascade's progress towards implementing the Language Access Plan Action Items.

Program Accessibility

Starting in 2025, Cascade is annually providing the Washington Utilities and Transportation Commission with data on its performance measures established in its most recent multi-year rate plan (Docket UG-240008). That reporting includes data on energy efficiency program participation; incentives paid per project and whether the participating customers live on tribal land or in a vulnerable community. With this data, Cascade is establishing baselines on how energy efficiency benefits are distributed within its service territory. Two years of data is not enough to establish clear trends, but Cascade intends to use the data in the future to determine if targeted marketing or other program enhancements are necessary to ensure energy efficiency programs promote energy justice.

As part of Cascade's efforts to engage in restorative energy justice and reduce the energy burdens of vulnerable communities, the Company implemented the Weatherization Incentive Program Pilot (WIP Pilot). The WIP Pilot was developed in collaboration with the stakeholders, Community Action Agencies (CAAs) and the EAG. The WIP pilot was designed to enhance program participation by allowing weatherization contractors to co-administer WIP with CAAs since CAAs alone cannot keep pace with the growing need for

weatherization in the community. Refer to “Low-Income Weatherization Incentive Program Pilot” section for additional program structure and results.

Also, in Docket UG-240141, the Commission ordered that Cascade increase its CARES enrollment to 20 percent by December 31, 2024. To meet this requirement, Cascade auto-enrolled 4,994 customers into CARES in December 2024. Cascade used its Low-Income Propensity Model to identify Decile 1 and 2 (D1 and D2) customers and then applied the following additional criteria to the D1 and D2 accounts:

- The customer has a prior obligation on any prior account; or
- The customer’s account has an active payment plan/time payment arrangement; or
- The customer’s account has a past due balance of \$50 or more

About 70% of the identified customers were from D1 and 30% were from D2. All were placed on the tier-5 discount with a 24-month term. Cascade sent a letter and/or email to each customer to advise them that they were enrolled in the CARES discount program. In addition, Cascade’s credit team called each auto-enrolled customer to make them aware of their new service under CARES and inform them they could apply to change discount tiers if warranted by their household income.

Protecting Customer Information

Through discussions with the EAG and the CARES Advisory Group, Cascade learned that undocumented customers have been increasingly less likely to enroll in the Company’s programs due to fear that the current administration may seize utility data in an effort to deport non-citizens. The Company sought to provide some reassurance to Cascade customers currently participating in and/or interested in participating in the Bill Assistance and Energy Efficiency Programs by adding additional privacy language to the Company’s website.

Protecting Customer Information

Cascade collects only the information it needs to provide safe, reliable, and affordable natural gas service to its customers. Energy discount and affordability programs may be available to customers based on their household size and income. When Cascade collects information about household size and income, it protects that information as described in Cascade's privacy policy. Cascade encourages customers who would like to know more about bill assistance options to contact Cascade's Customer Service at 888-522-1130.

We understand that our customers are concerned about the safety and the security of their information. This is especially true in immigrant communities. Cascade does not ask about customers' immigration status. Cascade also does not require customers to provide their Social Security Numbers to receive service or bill assistance.

Cascade may occasionally be required to disclose customer information under state and federal law. For example, if a judge orders Cascade to produce customer information, Cascade must comply. Cascade cannot, however, share information that it does not have, like Social Security information or the immigration status of its customers.

While Cascade recognizes that this approach may not be universally applicable or may not fully address all immigration-related concerns, the Company remains committed to taking reasonable measures to protect customer information. If these efforts can provide even a single family with greater peace of mind, Cascade believes such actions are both meaningful and appropriate.

Overall Adoption of Equity Lens to Cascade's Operations

Cascade and its EAG have discussed many topics that have helped the Company apply an equity lens in various areas of its operations. Notable discussion topics include the following:

- Vendor Selection
- Infrastructure Investment and Jobs Act/Inflation Reduction Act
- Bill Assistance Outreach
- Disconnection Policies
- Thermal Energy Networks Project Planning & Overview
- Renewable Natural Gas
- Integrated Resource Planning

Administrative Changes

2025 saw rapid changes in future expectations and C/I Program uptake due to administrative changes, including equipment price increases and tariffs. This uncertainty impacted the C/I EEIP Program, as many projects require significant investment, planning, and business valuation calculations, which are sensitive to changes in future expectations. For example, a mature heat recovery project with over 10,000 therms of predicted therm savings was terminated once Tariffs were announced in March 2025. Increased material availability and pricing volatility pushed projected operating costs and payback periods

beyond the project's financial thresholds, undermining revenue/cost savings forecasts, and led to the project no longer being deemed viable.

To combat these factors, Cascade made multiple real-time adjustments to this subset of the Program to maximize the cost-effective energy savings which remain available in the market, including:

- Doubling C/I outreach budget and planned activities
 - \$50,000 to \$100,000
- Expanding sponsorships of local building centers and relevant conferences
- Offering contractor social hours and connection opportunities
- Utilizing small business mailers and new outreach mediums

Cascade experienced an uptick in customer interest and project submission among customers in the second half of 2025, acting as stewards of energy efficient actions for customers. This increase showed that the adjustments proved effective. While increasing spending caused efficiency ratios to decrease, Cascade was still able to maintain cost effectiveness.

Although therm savings for 2025 fell short of goal, in part due to the minor payment timing discrepancies for project recognition previously detailed in the Commercial/Industrial section of this report, Cascade's partnership with TRC Industries Inc. for Program implementation remains strong with a path towards exceeding goals in the upcoming biennium.

Data-Driven Decisions

The Company has taken a wholistic approach to gathering and utilizing more real-time data and technology capabilities to make Program process and delivery improvements. Cascade made a commitment in this biennium for all outreach messaging and content to contain trackable QR codes or links so data-driven decisions can be made to quantitatively scale campaigns accordingly in the future. Additionally, Cascade is continually evaluating changes in submission quantities per measure type, alongside the Advisory Group, to gauge if mid-cycle Program changes are needed to hit therm saving goals, and how consumer elasticities may be estimated for future Program incentive changes. No such changes were made in this biennium, due in part to recent historic changes to measure incentive structures outlined in the 2024-2025 BCP driving record customer uptake and Program performance in this biennium.⁷

⁷ 2024/2025 Cascade Natural Gas Biennial Conservation Plan | [UG-23097](#)

In an effort to maintain the Program's robust performance, residential measures had their incentives increased this biennium, with many incentives doubling or more. Examples of increased rebate values in the 2024-2025 biennium include:

- Residential
 - Furnace: 33% -100%
 - Attic Insulation: 60%
 - Duct Sealing: 233%

Due to the shortfall in therm savings for the C/I Program in 2024-2025, Cascade made the decision to increase incentive values to drive participation for 20 of 28 commercial measures while remaining cost effective. The Program hopes to see an increase in prescriptive measure participation from these changes, which will help offset the volatility of custom projects in achieving goal. Examples of increased rebate values for the 2026-2027 biennium include:

- Commercial/Industrial
 - Boilers: 192%
 - Demand Control Ventilation: 60%
 - Water Heaters: 25% - 100%

Additionally, measure offerings have gone through complete review, and many have updated pre-conditions and efficiency ratings to remain up to date with new standards and practices. These changes reflect the Company's goal of acquiring all cost-effective therm savings available, while striving to move the portfolio toward a UCT ratio closer to 1.0 to maximize completions of available cost-effective projects. One new measure planned for the 2026-2027 Commercial Program plan is a new radiant heater measure allowing for outdoor installation (e.g., restaurants, garage bays). This new measure was born out of seeing the underperformance of the current radiant heater measure and Cascade responding to feedback received from its commercial partner, TRC Industries Inc.

Team Resourcing

Cascade's EEIP Program provides a unique touchpoint for over 200,000 customers in the service territory. Appropriate changes to team resourcing were made in 2025 to ensure we are serving the evolving needs of our customers and the Program appropriately.

The Company recognized a continual shift towards more Trade Ally and Point of Sale projects over the prior biennium and responsively added a new full-time position, Trade Ally Coordinator, dedicated to servicing and fostering this subset of the Program in Q1 2025. The Trade Ally Coordinator has been crucial for the continued growth in this rebate submission stream, which has been a shining light for the program in the current

biennium. The upcoming biennium will see additional, gradual resourcing shifts into the Trade Ally and Point of Sale programs, with increased investment in relationship building amongst Washington Contractors, education on program requirements, incremental improvements, and updating program manuals and documentation requirements. Additionally, Cascade hired a much-needed full-time analyst level position in Q3 2025 to service the Low-Income Weatherization Program which undertook new initiatives in equity and pilots in 2025 and 2026.

Home Energy Report Pilot

The Home Energy Report Pilot concluded its first iteration in the fall of 2024; the final bi-monthly report was successfully sent out to almost 10,000 residential customers. Cascade first began working on this project in 2022, using software developed by Brillion Inc. (formerly EnergyX) to encourage behavioral changes for customers through Home Energy Reports. These reports inform customers about their energy use and provide personalized, accurate reports outlining specific opportunities for households to save energy in their homes. The pilot has focused these reports on a subset of the Company's residential customers and evaluated the results against a control group of residential customers.

Approximately 10,000 residential customers received these reports every other month for a period of 12 months, beginning in the fall of 2023. These reports were delivered either physically or electronically, depending on the preferred delivery method of the customer. Draft results for the first round of this pilot were shared with the Advisory Group in Q1 2025. These results underwent thorough third-party M&V to verify findings from the first round of the pilot and suggest improvements for future implementations.

In Q4 2025, Cascade began a second round of this pilot over a similar timeframe, utilizing learnings from the first round such as a larger cohort, different messaging, and new participant-selection strategies. The Company will continue to work alongside the Advisory Group to review this second iteration of the Home Energy Report pilot with the goal of prescriptive Program implementation and cost-effective therm savings within the subsequent two biennium.

Initiating a pilot program such as this embodies the philosophy of continual improvement allowing CNGC to test a targeted intervention method on a small scale, gather actionable data, and iteratively refine the offering to improve efficiency before a potential broader rollout.

ERA Data Migration

The software and technologies used to process rebates and communicate with Program partners is extraordinarily important. Prior to the current solution, CNGC was seriously hamstrung by the limited capabilities of their software solution including delayed software bug fixes, incorrect logic updates, and unintuitive reporting. Beginning in 2024, Cascade undertook a monumental task of developing and migrating all Program processes to a new, in-house developed software known as Enterprise Rebate Application (ERA). The ERA platform offers an integrated processing and payment disbursement platform with the opportunity for both customers and Trade Allies to directly submit an application and track the status throughout the journey of the rebate. Rebates first began being processed through this software in Q1 2025 and continued throughout the rest of 2025. Incremental improvements have continued to be made to this software throughout the rest of 2025 to improve processing efficiency and customer experience. Cascade expects to see continued iterative improvements in the upcoming biennium to further streamline the customer and contractor submission experience while reducing Cascade's per project administrative burden. The immediate result is a more all-in-one solution, allowing customers to log directly into their CNGC account to submit and continually monitor the status of their rebate as one beneficial example.

Low-Income Weatherization Incentive Program Pilot

The Company periodically revisits program structure in order to ensure financial barriers are reduced for Agencies and offer more direct benefits to the customers participating in the WIP. In 2025, the Company revised Tariff WN U-3 to commence a one-year, full-time pilot, whereby third-party weatherization contractors would be allowed to administer unprocessed leads for Cascade's Low-Income Weatherization Incentive Program (WIP), as opposed to traditionally being limited to Community Action Agencies, thus increasing the amount of weatherization projects able to be completed.

The CAAs continued to be the primary program administrators, holding the right of first refusal on any customer lead. Agency work and involvement with WIP is valued, and the intent of the pilot was not to diminish their role or remuneration for program administration. The pilot offering was a means to address the influx of program referrals the Company received from its Cascade Arrearage Relief and Energy Savings ("CARES") low-income bill assistance program.

Enrollment started with phone outreach to 38 CNGC CARES customers. In September 2025, a roster of 16 customers opted into the pilot offering via telephone. An email was delivered to those 16 customers explaining the program in greater detail and providing a list of eligible measures. Upon reply/receipt of acknowledgement and a written opt-in, CNGC delivered the customer contact information to a pre-approved/interviewed-by-

CNGC, weatherization contractor previously enlisted in the WIP Pilot. From that point forward, all scheduling, in-progress reports, and project management were in the hands of the Contractor. CNGC was available for consultation and discussion, which was an important aspect of success.

During October 2025 through December 2025, five whole-house weatherization projects were completed. The documentation for the projects matched the requirements of the Washington Department of Commerce. Copious photographs of completed work were delivered to CNGC. Third-party inspections of the work were completed for each participating contractor, using the inspection protocol provided by Commerce. All projects passed inspection.

Two additional projects were in progress but are not included in this report due to the end-of-year cutoff of the 2025 WIP Pilot. CNGC continues outreach for the 2026 WIP Pilot to date.

Table 12: 2025 Low-Income WIP Pilot Program Results

Key Performance Metrics	
Total Incentives	\$140,472
Measures Installed	26
Therms Saved	1,247

Table 13: 2025 Low-Income WIP Pilot Program Measure Highlights

2025 Low-Income Weatherization Pilot Program Measures			
Weatherization			
Insulation	Measures	Therms	% of Therm Savings
Ceiling or Attic Insulation	3	241	19%
Floor Insulation	4	211	17%
Wall Insulation	2	45	4%
Duct Insulation	4	95	8%
Other Weatherization	Measures	Therms	% of Therm Savings
Duct Sealing	4	308	25%
Infiltration Reduction	4	52	4%
Subtotals	21	952	76%
Equipment Upgrades	Measures	Therms	% of Therm Savings
95%+ Furnace	2	222	18%
Water Heater Insulation	2	66	5%
Low Flow Faucet Aerator	1	7	1%
Subtotals	5	295	24%
Residential Totals	26	1247	100%

Quality Control Inspections

Quality control inspections provide the highest quality, real-time data to ensure measures are being installed at or above standard for our customers. The Company inspects a sample of residential projects to verify building principles were followed throughout the installation process and anticipated therm savings should be experienced in the coming years for the premise. Cascade has made a commitment to proactively monitor trends in inspection failures as they arise to make corrections as soon as possible. These inspections shall remain a powerful tool in the upcoming biennium and could be considered a main contributor to the positive EM&V billing data results the company has received over the past biennium.

Residential Sector

See Table 14: Residential Program Inspection Survey for Residential Program QC activity totals in 2024-2025. It should be noted that there were no residential QC inspections performed in Zone Two in 2024. This was due to a variety of factors, including comparatively low program participation in the region, as well as the lack of inspectors available through Community Action Agencies.

Table 14: Residential Program Inspection Survey

Climate Zone	QC performed	
	2024	2025
Zone One	62	85
Zone Two	0	20
Zone Three	186	75
Total	248	180

	Pass		Fail*	
	2024	2025	2024	2025
Measure Inspection Count	474	471	33	38

*All failed inspections were remediated by the contractor

Residential inspections verify that applications match the installed measures, the measures meet Program minimum efficiency requirements, all health and safety requirements are addressed, and industry best practices are demonstrated. The inspector verifies the efficiency of the equipment, and in the case of insulation / windows, the R-values / U-factors to confirm deemed savings. If an issue is noted as part of an inspection, the customer and contractor are notified, and the contractor is required to correct the issue. Cascade also uses QC inspections to confirm the quality of installations performed by CNGC Trade Allies and to vet contractors seeking enrollment to the Trade Ally Program.

Out of 945 measures, 7.5% failed prior to being remediated by the contractor. The most common reason for initial failures was attic insulation installed below the required amount. These results and remediation tasks represent a satisfactory inspection metric for the Program.

Commercial/Industrial Sector

All C/I inspections are performed by the Company's C/I vendor as part of their Program delivery. The inspection includes one of four elements: (1) pre-installation inspection, (2) post-installation verification, (3) study review, and/or (4) general project review. The

reviewer verifies all measures listed on the application were installed, are operational, and meet the Program requirements, including startup reports and invoices. Photos of the installed equipment are often included for verification. The final step of the inspection is when the reviewer confirms their approval, signing and dating the completed form.

Table 15: Commercial/Industrial Program Inspection Survey

Climate Zone	QC Performed	
	2024	2025
Zone One	13	13
Zone Two	13	13
Zone Three	18	18
Total	44	44

Participation Summary

A full breakdown of therm savings, Utility Costs, and Total Resource Costs by all measures and Programs for 2024 can be found within the following documents filed in addition to this report with the WUTC:

- 230937-CNGC-2024-Conservation-Arpt-WP-1-06-12-2025.xlsx
 - Cost-effectiveness calculations for the entire portfolio
- 230937-CNGC-2024-Conservation-Arpt-WP-2-06-12-2025.xlsx
 - Cost-effectiveness calculation for the C/I Program
- 230937-CNGC-2024-Conservation-Arpt-WP-3-06-12-2025.xlsx
 - Cost-effectiveness calculation for the Residential Program
- 230937-CNGC-2024-Conservation-Arpt-WP-4-06-12-2025.xlsx
 - Cost-effectiveness calculation for the Low-Income Weatherization Program
- 230937-CNGC-2024-NEEA-Arpt-for-CNGC-WP-5-06-12-2025.pdf
 - Outlines NEEA's efforts on behalf of CNGC

A full breakdown of therm savings, Utility Costs, and Total Resource Costs by all measures and Programs for 2025 can be found within the following documents filed in addition to this report with the WUTC:

- 230937-CNGC-2024-2025-Biennium-Conservation-Arpt-WP-1-06-11-2026.xlsx
 - Cost-effectiveness calculation for entire portfolio
- 230937-CNGC-2024-2025-Biennium-Conservation-Arpt-WP-2-06-11-2026.xlsx
 - Cost-effectiveness calculation for the C/I Program

- 230937-CNGC-2024-2025-Biennium-Conservation-Arpt-WP-3-06-11-2026.xlsx
 - Cost-effectiveness calculation for the Residential Program
- 230937-CNGC-2024-2025-Biennium-Conservation-Arpt-WP-4-06-11-2026.xlsx
 - Cost-effectiveness calculation for the Low-Income Weatherization Program
- 230937-CNGC-2025-NEEA-Arpt-for-CNGC-WP-5-06-11-2026.pdf
 - Outlines NEEA's efforts on behalf of CNGC

Updates to 2023 Program Achievements

No 2023 true-up is provided, as no material additional expenditures or rebates were submitted after the report was filed.

Updates to 2024 Program Achievements

NEEA updated their estimated therm savings for 2024. The 2024 savings decreased by less than two percent, to 65,535 Therms. NEEA updated the new construction estimates for both residential and commercial new construction based on revisions from Dodge Analytics and the Department of Housing and Urban Development. Table 16: NEEA Estimated 2024 Therm Savings shows the changes. NEEA's Market Research and Evaluation team managed nearly 40 third-party research and evaluation to support alliance Market Transformation programs, building codes, and new product standards work, as well as NEEA's special project work in end-use load flexibility and whole building performance standards. In addition, the team managed work on projects that measured compliance with updated building energy codes. These projects, along with the codes' market progress evaluation and a review of NEEA's approach for developing counterfactual baselines for state energy codes, provide the market with valuable information on the market's response to code changes, informs strategy, and supports evaluation of NEEA and its partners' influence on building energy codes.

Table 16: NEEA Estimated 2024 Therm Savings

Sector	2024 Annual Report	Update
Residential	56,672	56,517
Commercial	10,162	9,017
Total	66,834	65,535

While reviewing work papers from 2024, a formula error was found in the calculation for the weighted measure life in the Residential Program. This caused the 2024 Residential UCT and TRC ratios to be reported slightly lower than actual, with minimal material impact to the Program. The updated data has been presented in Table 3: Program Cost Effectiveness.